

## FORM ADV

### UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

Primary Business Name: **HARTFORD INVESTMENT MANAGEMENT COMPANY**

CRD Number: **106699**

Annual Amendment - All Sections

Rev. 10/2021

3/27/2025 4:04:12 PM

**WARNING:** Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4.

#### Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you. If you are filing an *umbrella registration*, the information in Item 1 should be provided for the *filing adviser* only. General Instruction 5 provides information to assist you with filing an *umbrella registration*.

A. Your full legal name (if you are a sole proprietor, your last, first, and middle names):

**HARTFORD INVESTMENT MANAGEMENT COMPANY**

B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A.

**HARTFORD INVESTMENT MANAGEMENT COMPANY**

*List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.*

(2) If you are using this Form ADV to register more than one investment adviser under an *umbrella registration*, check this box

*If you check this box, complete a Schedule R for each relying adviser.*

C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.(1)), enter the new name and specify whether the name change is of

your legal name or  your primary business name:

D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: **801-53542**

(2) If you report to the SEC as an *exempt reporting adviser*, your SEC file number:

(3) If you have one or more Central Index Key numbers assigned by the SEC ("CIK Numbers"), all of your CIK numbers:

**CIK Number**

922439

E. (1) If you have a number ("CRD Number") assigned by the *FINRA's CRD system* or by the *IARD system*, your CRD number: **106699**

*If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.*

(2) If you have additional CRD Numbers, your additional CRD numbers:

No Information Filed

F. *Principal Office and Place of Business*

(1) Address (do not use a P.O. Box):

Number and Street 1:

ONE HARTFORD PLAZA

Number and Street 2:

City:

HARTFORD

State:

Connecticut

Country:

United States

ZIP+4/Postal Code:

06155

If this address is a private residence, check this box:

*List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest twenty-five offices in terms of numbers of employees as of the end of your most recently completed fiscal year.*

(2) Days of week that you normally conduct business at your *principal office and place of business*:

Monday - Friday  Other:

Normal business hours at this location:

8:00 A.M. TO 5:00 P.M.

(3) Telephone number at this location:

860-297-6700

(4) Facsimile number at this location, if any:

877-357-0645

(5) What is the total number of offices, other than your *principal office and place of business*, at which you conduct investment advisory business as of the end of your most recently completed fiscal year?



O. Did you have \$1 billion or more in assets on the last day of your most recent fiscal year?

If yes, what is the approximate amount of your assets:

- \$1 billion to less than \$10 billion
- \$10 billion to less than \$50 billion
- \$50 billion or more

Yes  No

*For purposes of Item 1.O. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.*

P. Provide your *Legal Entity Identifier* if you have one:

FE0BULMG7PY8G4MG7C65

A *legal entity identifier* is a unique number that companies use to identify each other in the financial marketplace. You may not have a *legal entity identifier*.

#### SECTION 1.B. Other Business Names

No Information Filed

#### SECTION 1.F. Other Offices

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:  
3004 CAPULLO COURT

Number and Street 2:

City:  
WESLEY CHAPEL

State:  
North Carolina

Country:  
United States

ZIP+4/Postal Code:  
28104

If this address is a private residence, check this box:

Telephone Number:  
1-860-297-6890

Facsimile Number, if any:

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD Branch Number* here:

How many *employees* perform investment advisory functions from this office location?

1

Are other business activities conducted at this office location? (check all that apply)

- (1) Broker-dealer (registered or unregistered)
- (2) Bank (including a separately identifiable department or division of a bank)
- (3) Insurance broker or agent
- (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (5) Registered municipal advisor
- (6) Accountant or accounting firm
- (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:  
6181 CYPRESS HOLLOW WAY

Number and Street 2:

City:  
NAPLES

State:  
Florida

Country:  
United States

ZIP+4/Postal Code:  
34109

If this address is a private residence, check this box:

Telephone Number:  
860-297-6297

Facsimile Number, if any:

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD Branch Number* here:

How many *employees* perform investment advisory functions from this office location?

1

Are other business activities conducted at this office location? (check all that apply)

- (1) Broker-dealer (registered or unregistered)
- (2) Bank (including a separately identifiable department or division of a bank)
- (3) Insurance broker or agent
- (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (5) Registered municipal advisor
- (6) Accountant or accounting firm
- (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

#### SECTION 1.I. Website Addresses

List your website addresses, including addresses for accounts on publicly available social media platforms where you control the content (including, but not limited to, Twitter, Facebook and/or LinkedIn). You must complete a separate Schedule D Section 1.I. for each website or account on a publicly available social media platform.

Address of Website/Account on Publicly Available Social Media Platform: <https://www.facebook.com/Hartford-Investment-Management-Company-153262228023605>

Address of Website/Account on Publicly Available Social Media Platform: <https://www.linkedin.com/company/hartford-investment-management/>

Address of Website/Account on Publicly Available Social Media Platform: <HTTPS://WWW.HIMCO.COM>

#### SECTION 1.L. Location of Books and Records

Complete the following information for each location at which you keep your books and records, other than your *principal office and place of business*. You must complete a separate Schedule D, Section 1.L. for each location.

Name of entity where books and records are kept:

IRON MOUNTAIN

Number and Street 1:

1100 KENNEDY ROAD

Number and Street 2:

City:  
WINDSOR

State:  
Connecticut

Country:  
United States

ZIP+4/Postal Code:  
06095

If this address is a private residence, check this box:

Telephone Number:  
860-769-2521

Facsimile number, if any:

This is (check one):

- one of your branch offices or affiliates.
- a third-party unaffiliated recordkeeper.
- other.

Briefly describe the books and records kept at this location.  
ARCHIVED RECORDS

**SECTION 1.M. Registration with Foreign Financial Regulatory Authorities**

No Information Filed

## Item 2 SEC Registration/Reporting

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting an *annual updating amendment* to your SEC registration. If you are filing an *umbrella registration*, the information in Item 2 should be provided for the *filing adviser* only.

A. To register (or remain registered) with the SEC, you must check **at least one** of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an *annual updating amendment* to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you may affirmatively respond to each of these items.

You (the adviser):

(1) are a **large advisory firm** that either:

- (a) has regulatory assets under management of \$100 million (in U.S. dollars) or more; or
- (b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent *annual updating amendment* and is registered with the SEC;

(2) are a **mid-sized advisory firm** that has regulatory assets under management of \$25 million (in U.S. dollars) or more but less than \$100 million (in U.S. dollars) and you are either:

- (a) not required to be registered as an adviser with the *state securities authority* of the state where you maintain your *principal office and place of business*; or
- (b) not subject to examination by the *state securities authority* of the state where you maintain your *principal office and place of business*;

*Click [HERE](#) for a list of states in which an investment adviser, if registered, would not be subject to examination by the state securities authority.*

(3) Reserved

(4) have your *principal office and place of business* **outside the United States**;

(5) are **an investment adviser (or subadviser) to an investment company** registered under the Investment Company Act of 1940;

(6) are **an investment adviser to a company which has elected to be a business development company** pursuant to section 54 of the Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under management;

(7) are a **pension consultant** with respect to assets of plans having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a);

(8) are a **related adviser** under rule 203A-2(b) that *controls*, is *controlled by*, or is under common *control* with, an investment adviser that is registered with the SEC, and your *principal office and place of business* is the same as the registered adviser;

*If you check this box, complete Section 2.A.(8) of Schedule D.*

(9) are an **adviser** relying on rule 203A-2(c) because you **expect to be eligible for SEC registration within 120 days**;

*If you check this box, complete Section 2.A.(9) of Schedule D.*

(10) are a **multi-state adviser** that is required to register in 15 or more states and is relying on rule 203A-2(d);

*If you check this box, complete Section 2.A.(10) of Schedule D.*

(11) are an **Internet adviser** relying on rule 203A-2(e);

*If you check this box, complete Section 2.A.(11) of Schedule D.*

(12) have **received an SEC order** exempting you from the prohibition against registration with the SEC;

*If you check this box, complete Section 2.A.(12) of Schedule D.*

(13) are **no longer eligible** to remain registered with the SEC.

## State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers

C. Under state laws, SEC-registered advisers may be required to provide to *state securities authorities* a copy of the Form ADV and any amendments they file with the SEC. These are called *notice filings*. In addition, *exempt reporting advisers* may be required to provide *state securities authorities* with a copy of reports and any amendments they file with the SEC. If this is an initial application or report, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to direct your *notice filings* or reports to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to your registration to stop your *notice filings* or reports from going to state(s) that currently receive them, uncheck the box(es) next to those state(s).

### Jurisdictions

<input type="checkbox"/> AL	<input type="checkbox"/> IL	<input type="checkbox"/> NE	<input type="checkbox"/> SC
<input type="checkbox"/> AK	<input type="checkbox"/> IN	<input type="checkbox"/> NV	<input type="checkbox"/> SD
<input type="checkbox"/> AZ	<input type="checkbox"/> IA	<input type="checkbox"/> NH	<input type="checkbox"/> TN
<input type="checkbox"/> AR	<input type="checkbox"/> KS	<input type="checkbox"/> NJ	<input checked="" type="checkbox"/> TX
<input type="checkbox"/> CA	<input type="checkbox"/> KY	<input type="checkbox"/> NM	<input type="checkbox"/> UT
<input type="checkbox"/> CO	<input type="checkbox"/> LA	<input type="checkbox"/> NY	<input type="checkbox"/> VT
<input checked="" type="checkbox"/> CT	<input type="checkbox"/> ME	<input type="checkbox"/> NC	<input type="checkbox"/> VI
<input type="checkbox"/> DE	<input type="checkbox"/> MD	<input type="checkbox"/> ND	<input type="checkbox"/> VA
<input type="checkbox"/> DC	<input type="checkbox"/> MA	<input type="checkbox"/> OH	<input type="checkbox"/> WA
<input type="checkbox"/> FL	<input type="checkbox"/> MI	<input type="checkbox"/> OK	<input type="checkbox"/> WV
<input type="checkbox"/> GA	<input type="checkbox"/> MN	<input type="checkbox"/> OR	<input type="checkbox"/> WI
<input type="checkbox"/> GU	<input type="checkbox"/> MS	<input type="checkbox"/> PA	<input type="checkbox"/> WY

HI  
 ID

MO  
 MT

PR  
 RI

If you are amending your registration to stop your notice filings or reports from going to a state that currently receives them and you do not want to pay that state's notice filing or report filing fee for the coming year, your amendment must be filed before the end of the year (December 31).

#### **SECTION 2.A.(8) Related Adviser**

If you are relying on the exemption in rule 203A-2(b) from the prohibition on registration because you *control*, are *controlled* by, or are under common *control* with an investment adviser that is registered with the SEC and your *principal office and place of business* is the same as that of the registered adviser, provide the following information:

Name of Registered Investment Adviser

CRD Number of Registered Investment Adviser

SEC Number of Registered Investment Adviser

-

#### **SECTION 2.A.(9) Investment Adviser Expecting to be Eligible for Commission Registration within 120 Days**

If you are relying on rule 203A-2(c), the exemption from the prohibition on registration available to an adviser that expects to be eligible for SEC registration within 120 days, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these representations:

- I am not registered or required to be registered with the SEC or a *state securities authority* and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective.
- I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.

#### **SECTION 2.A.(10) Multi-State Adviser**

If you are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.

If you are applying for registration as an investment adviser with the SEC, you must make both of these representations:

- I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the *state securities authorities* in those states.
- I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the *state securities authorities* of those states.

If you are submitting your *annual updating amendment*, you must make this representation:

- Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the *state securities authorities* in those states.

#### **SECTION 2.A.(11) Internet Adviser**

If you are relying on rule 203A-2(e), the Internet adviser exemption from the prohibition on registration, you are required to make a representation about your eligibility for SEC registration. By checking the appropriate box, you will be deemed to have made the required representation.

If you are applying for registration as an investment adviser with the SEC or changing your existing Item 2 response regarding your eligibility for SEC registration, you must make this representation:

- I will provide investment advice on an ongoing basis to more than one client exclusively through an *operational interactive website*.

If you are filing an annual updating amendment to your existing registration and are continuing to rely on the Internet adviser exemption for SEC registration, you must make this representation:

- I have provided and will continue to provide investment advice on an ongoing basis to more than one client exclusively through an *operational interactive website*.

#### **SECTION 2.A.(12) SEC Exemptive Order**

If you are relying upon an SEC *order* exempting you from the prohibition on registration, provide the following information:

Application Number:

803-

Date of *order*:

**Item 3 Form of Organization**

If you are filing an *umbrella* registration, the information in Item 3 should be provided for the *filing adviser* only.

A. How are you organized?

- Corporation
- Sole Proprietorship
- Limited Liability Partnership (LLP)
- Partnership
- Limited Liability Company (LLC)
- Limited Partnership (LP)
- Other (specify):

*If you are changing your response to this Item, see Part 1A Instruction 4.*

B. In what month does your fiscal year end each year?

DECEMBER

C. Under the laws of what state or country are you organized?

State      Country  
Delaware    United States

*If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.*

*If you are changing your response to this Item, see Part 1A Instruction 4.*

**Item 4 Successions****Yes No**

A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)?

*If "yes", complete Item 4.B. and Section 4 of Schedule D.*

B. Date of Succession: (MM/DD/YYYY)

*If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.*

**SECTION 4 Successions**

No Information Filed

**Item 5 Information About Your Advisory Business - Employees, Clients, and Compensation**

Responses to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A Instruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.

**Employees**

If you are organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).

A. Approximately how many employees do you have? Include full- and part-time employees but do not include any clerical workers.

317

B. (1) Approximately how many of the employees reported in 5.A. perform investment advisory functions (including research)?

115

(2) Approximately how many of the employees reported in 5.A. are registered representatives of a broker-dealer?

0

(3) Approximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment adviser representatives?

0

(4) Approximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment adviser representatives for an investment adviser other than you?

0

(5) Approximately how many of the employees reported in 5.A. are licensed agents of an insurance company or agency?

0

(6) Approximately how many firms or other persons solicit advisory clients on your behalf?

0

In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.

**Clients**

In your responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

C. (1) To approximately how many clients for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?

24

(2) Approximately what percentage of your clients are non-United States persons?

13%

D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, do not answer (1)(d) or (3)(d) below.

Indicate the approximate number of your clients and amount of your total regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of client. If you have fewer than 5 clients in a particular category (other than (d), (e), and (f)) you may check Item 5.D.(2) rather than respond to Item 5.D.(1).

The aggregate amount of regulatory assets under management reported in Item 5.D.(3) should equal the total amount of regulatory assets under management reported in Item 5.F.(2)(c) below.

If a client fits into more than one category, select one category that most accurately represents the client to avoid double counting clients and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

Type of Client	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)	0	<input type="checkbox"/>	\$
(b) High net worth individuals	0	<input type="checkbox"/>	\$
(c) Banking or thrift institutions		<input checked="" type="checkbox"/>	\$ 2,410,592,956
(d) Investment companies	25		\$ 344,706,062
(e) Business development companies	0		\$
(f) Pooled investment vehicles (other than investment companies and business development companies)	13		\$ 19,767,778,694
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	5	<input type="checkbox"/>	\$ 3,814,064,775

(h) Charitable organizations	0	<input type="checkbox"/>	\$
(i) State or municipal <i>government entities</i> (including government pension plans)	0	<input type="checkbox"/>	\$
(j) Other investment advisers		<input checked="" type="checkbox"/>	\$ 5,544,538,820
(k) Insurance companies	44	<input type="checkbox"/>	\$ 82,027,790,722
(l) Sovereign wealth funds and foreign official institutions	0	<input type="checkbox"/>	\$
(m) Corporations or other businesses not listed above		<input checked="" type="checkbox"/>	\$ 78,168,339
(n) Other: SEGREGATED ACCOUNTS	7	<input type="checkbox"/>	\$ 10,883,626

#### Compensation Arrangements

E. You are compensated for your investment advisory services by (check all that apply):

- (1) A percentage of assets under your management
- (2) Hourly charges
- (3) Subscription fees (for a newsletter or periodical)
- (4) Fixed fees (other than subscription fees)
- (5) Commissions
- (6) *Performance-based fees*
- (7) Other (specify): COST REIMBURSEMENT, AFFILIATE COMPENSATION (SEE PART 2A, ITEM 6)

#### Item 5 Information About Your Advisory Business - Regulatory Assets Under Management

##### Regulatory Assets Under Management

Yes  No

F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios?

(2) If yes, what is the amount of your regulatory assets under management and total number of accounts?

	U.S. Dollar Amount	Total Number of Accounts
Discretionary:	(a) \$ 110,081,494,631	(d) 154
Non-Discretionary:	(b) \$ 3,917,029,363	(e) 23
Total:	(c) \$ 113,998,523,994	(f) 177

*Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item.*

(3) What is the approximate amount of your total regulatory assets under management (reported in Item 5.F.(2)(c) above) attributable to *clients* who are non-United States persons?

\$ 1,361,908,216

#### Item 5 Information About Your Advisory Business - Advisory Activities

##### Advisory Activities

G. What type(s) of advisory services do you provide? Check all that apply.

- (1) Financial planning services
- (2) Portfolio management for individuals and/or small businesses
- (3) Portfolio management for investment companies (as well as "business development companies" that have made an election pursuant to section 54 of the Investment Company Act of 1940)
- (4) Portfolio management for pooled investment vehicles (other than investment companies)
- (5) Portfolio management for businesses (other than small businesses) or institutional *clients* (other than registered investment companies and other pooled investment vehicles)
- (6) Pension consulting services
- (7) Selection of other advisers (including *private fund managers*)
- (8) Publication of periodicals or newsletters
- (9) Security ratings or pricing services
- (10) Market timing services
- (11) Educational seminars/workshops
- (12) Other(specify): PORTFOLIO CONSULTING FOR UNIT INVESTMENT TRUSTS (NO NEW TRUSTS AFTER 2/29/24) - SEE PART 2A, ITEM 4.B

*Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 814 number of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Schedule D.*

H. If you provide financial planning services, to how many *clients* did you provide these services during your last fiscal year?

- 0
- 1 - 10
- 11 - 25
- 26 - 50
- 51 - 100
- 101 - 250
- 251 - 500
- More than 500

If more than 500, how many?  
(round to the nearest 500)

*In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.*

	Yes	No
I. (1) Do you participate in a <i>wrap fee program</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(2) If you participate in a <i>wrap fee program</i> , what is the amount of your regulatory assets under management attributable to acting as:	\$	
(a) <i>sponsor</i> to a <i>wrap fee program</i>	<input type="radio"/>	<input checked="" type="radio"/>
(b) <i>portfolio manager</i> for a <i>wrap fee program</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(c) <i>sponsor</i> to and <i>portfolio manager</i> for the same <i>wrap fee program</i> ?	<input type="radio"/>	<input checked="" type="radio"/>

*If you report an amount in Item 5.I.(2)(c), do not report that amount in Item 5.I.(2)(a) or Item 5.I.(2)(b).*

*If you are a *portfolio manager* for a *wrap fee program*, list the names of the programs, their *sponsors* and related information in Section 5.I.(2) of Schedule D.*

*If your involvement in a *wrap fee program* is limited to recommending *wrap fee programs* to your clients, or you advise a mutual fund that is offered through a *wrap fee program*, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2).*

	Yes	No
J. (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?	<input type="radio"/>	<input checked="" type="radio"/>
(2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management?	<input checked="" type="radio"/>	<input type="radio"/>

K. Separately Managed Account *Clients*

Yes No

(1) Do you have regulatory assets under management attributable to *clients* other than those listed in Item 5.D.(3)(d)-(f) (separately managed account *clients*)?

*If yes, complete Section 5.K.(1) of Schedule D.*

(2) Do you engage in borrowing transactions on behalf of any of the separately managed account *clients* that you advise?

*If yes, complete Section 5.K.(2) of Schedule D.*

(3) Do you engage in derivative transactions on behalf of any of the separately managed account *clients* that you advise?

*If yes, complete Section 5.K.(2) of Schedule D.*

(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management?

*If yes, complete Section 5.K.(3) of Schedule D for each custodian.*

L. Marketing Activities

Yes No

(1) Do any of your *advertisements* include:

(a) Performance results?

(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?

(c) *Testimonials* (other than those that satisfy rule 206(4)-1(b)(4)(ii))?

(d) *Endorsements* (other than those that satisfy rule 206(4)-1(b)(4)(ii))?

(e) *Third-party ratings*?

(2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of *testimonials*, *endorsements*, or *third-party ratings*?

(3) Do any of your *advertisements* include *hypothetical performance*?

(4) Do any of your *advertisements* include *predecessor performance*?

**SECTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies**

If you check Item 5.G.(3), what is the SEC file number (811 or 814 number) of each of the registered investment companies and business development companies to which you act as an adviser pursuant to an advisory contract? You must complete a separate Schedule D Section 5.G.(3) for each registered investment company and business development company to which you act as an adviser.

SEC File Number  
811 - 21719

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

Series ID	Parallel Managed Account Regulatory assets under management
S000045893	\$ 0

**SECTION 5.I.(2) Wrap Fee Programs**

No Information Filed

**SECTION 5.K.(1) Separately Managed Accounts**

After subtracting the amounts reported in Item 5.D.(3)(d)-(f) from your total regulatory assets under management, indicate the approximate percentage of this remaining amount attributable to each of the following categories of assets. If the remaining amount is at least \$10 billion in regulatory assets under management, complete Question (a). If the remaining amount is less than \$10 billion in regulatory assets under management, complete Question (b).

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date. Each column should add up to 100% and numbers should be rounded to the nearest percent.

Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.

Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.

(a) Asset Type	Mid-year	End of year
(i) Exchange-Traded Equity Securities	0 %	0 %
(ii) Non Exchange-Traded Equity Securities	0 %	0 %
(iii) U.S. Government/Agency Bonds	8 %	7 %
(iv) U.S. State and Local Bonds	8 %	8 %
(v) Sovereign Bonds	1 %	1 %
(vi) Investment Grade Corporate Bonds	55 %	56 %
(vii) Non-Investment Grade Corporate Bonds	3 %	3 %
(viii) Derivatives	0 %	0 %
(ix) Securities Issued by Registered Investment Companies or Business Development Companies	3 %	3 %
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	5 %	5 %
(xi) Cash and Cash Equivalents	0 %	0 %
(xii) Other	17 %	17 %

Generally describe any assets included in "Other"

COMMERCIAL MORTGAGE LOANS REPRESENTED 12% FOR BOTH MID-YEAR AND END OF YEAR. ALTERNATIVE ASSETS WERE 2% FOR EACH REPORTING PERIOD. BANK LOANS WERE 2% FOR EACH REPORTING PERIOD. EACH INDIVIDUAL ADDITIONAL ASSET CLASS WITHIN (XII) OTHER CATEGORY REPRESENTS LESS THAN 1% OF TOTAL HOLDINGS.

(b) Asset Type	End of year
----------------	-------------

(i) Exchange-Traded Equity Securities	%
(ii) Non Exchange-Traded Equity Securities	%
(iii) U.S. Government/Agency Bonds	%
(iv) U.S. State and Local Bonds	%
(v) <i>Sovereign Bonds</i>	%
(vi) Investment Grade Corporate Bonds	%
(vii) Non-Investment Grade Corporate Bonds	%
(viii) Derivatives	%
(ix) Securities Issued by Registered Investment Companies or Business Development Companies	%
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	%
(xi) Cash and Cash Equivalents	%
(xii) Other	%

Generally describe any assets included in "Other"

#### **SECTION 5.K.(2) Separately Managed Accounts - Use of *Borrowings* and Derivatives**

**No information is required to be reported in this Section 5.K.(2) per the instructions of this Section 5.K.(2)**

If your regulatory assets under management attributable to separately managed accounts are at least \$10 billion, you should complete Question (a). If your regulatory assets under management attributable to separately managed accounts are at least \$500 million but less than \$10 billion, you should complete Question (b).

(a) In the table below, provide the following information regarding the separately managed accounts you advise. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise. End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

In column 3, provide aggregate *gross notional value* of derivatives divided by the aggregate regulatory assets under management of the accounts included in column 1 with respect to each category of derivatives specified in 3(a) through (f).

You may, but are not required to, complete the table with respect to any separately managed account with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

(i) Mid-Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) <i>Borrowings</i>	(3) Derivative Exposures					
			(a) <i>Interest Rate Derivative</i>	(b) <i>Foreign Exchange Derivative</i>	(c) <i>Credit Derivative</i>	(d) <i>Equity Derivative</i>	(e) <i>Commodity Derivative</i>	(f) <i>Other Derivative</i>
<b>Less than 10%</b>	\$ 49,454,971,584	\$ 0	2 %	0 %	0 %	0 %	0 %	0 %
<b>10-149%</b>	\$ 39,877,539,419	\$ 0	14 %	6 %	4 %	0 %	0 %	0 %
<b>150% or more</b>	\$ 897,627,322	\$ 0	775 %	0 %	0 %	923 %	0 %	0 %

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

PLEASE SEE SCHEDULE D MISCELLANEOUS FOR ADDITIONAL INFORMATION RELATED TO THE DERIVATIVE EXPOSURE PERCENTAGES NOTED IN THE CHART ABOVE.

(ii) End of Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) <i>Borrowings</i>	(3) Derivative Exposures					
			(a) <i>Interest Rate Derivative</i>	(b) <i>Foreign Exchange Derivative</i>	(c) <i>Credit Derivative</i>	(d) <i>Equity Derivative</i>	(e) <i>Commodity Derivative</i>	(f) <i>Other Derivative</i>
<b>Less than 10%</b>	\$ 53,865,353,889	\$ 0	2 %	0 %	0 %	0 %	0 %	0 %
<b>10-149%</b>	\$ 39,144,351,177	\$ 0	13 %	2 %	3 %	1 %	0 %	0 %
<b>150% or more</b>	\$ 876,334,172	\$ 0	951 %	0 %	0 %	1,354 %	0 %	0 %

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

PLEASE SEE SCHEDULE D MISCELLANEOUS FOR ADDITIONAL INFORMATION RELATED TO THE DERIVATIVE EXPOSURE PERCENTAGES NOTED IN THE CHART ABOVE.

(b) In the table below, provide the following information regarding the separately managed accounts you advise as of the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

You may, but are not required to, complete the table with respect to any separately managed accounts with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

<b>Gross Notional Exposure</b>	<b>(1) Regulatory Assets Under Management</b>	<b>(2) Borrowings</b>
<b>Less than 10%</b>	\$	\$
<b>10-149%</b>	\$	\$
<b>150% or more</b>	\$	\$

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

### **SECTION 5.K.(3) Custodians for Separately Managed Accounts**

Complete a separate Schedule D Section 5.K.(3) for each custodian that holds ten percent or more of your aggregate separately managed account regulatory assets under management.

(a) Legal name of custodian:

JP MORGAN CHASE BANK, N.A.

(b) Primary business name of custodian:

JP MORGAN CHASE BANK, N.A.

(c) The location(s) of the custodian's office(s) responsible for *custody* of the assets :

City:  
NEW YORK

State:  
New York

Country:  
United States

**Yes** **No**

(d) Is the custodian a *related person* of your firm?

(e) If the custodian is a broker-dealer, provide its SEC registration number (if any)

-

(f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)  
7H6GLXDRUGQFU57RNE97

(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?

\$ 51,857,964,630

(a) Legal name of custodian:

CITIBANK, N.A.

(b) Primary business name of custodian:

CITIBANK, N.A.

(c) The location(s) of the custodian's office(s) responsible for *custody* of the assets :

City:  
NEW YORK

State:  
New York

Country:  
United States

**Yes** **No**

(d) Is the custodian a *related person* of your firm?

(e) If the custodian is a broker-dealer, provide its SEC registration number (if any)

-

(f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)  
E57ODZWZ7FF32TWEFA76

(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?

\$ 10,358,017,843

**Item 6 Other Business Activities**

In this Item, we request information about your firm's other business activities.

A. You are actively engaged in business as a (check all that apply):

- (1) broker-dealer (registered or unregistered)
- (2) registered representative of a broker-dealer
- (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (4) futures commission merchant
- (5) real estate broker, dealer, or agent
- (6) insurance broker or agent
- (7) bank (including a separately identifiable department or division of a bank)
- (8) trust company
- (9) registered municipal advisor
- (10) registered security-based swap dealer
- (11) major security-based swap participant
- (12) accountant or accounting firm
- (13) lawyer or law firm
- (14) other financial product salesperson (specify):

*If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D.*

B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?

(2) If yes, is this other business your primary business?

*If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.*

(3) Do you sell products or provide services other than investment advice to your advisory clients?

*If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.*

**SECTION 6.A. Names of Your Other Businesses**

No Information Filed

**SECTION 6.B.(2) Description of Primary Business**

Describe your primary business (not your investment advisory business):

If you engage in that business under a different name, provide that name:

**SECTION 6.B.(3) Description of Other Products and Services**

Describe other products or services you sell to your *client*. You may omit products and services that you listed in Section 6.B.(2) above.

ADMINISTRATIVE SUPPORT SERVICES

If you engage in that business under a different name, provide that name:

## Item 7 Financial Industry Affiliations

In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your *clients*.

A. This part of Item 7 requires you to provide information about you and your *related persons*, including foreign affiliates. Your *related persons* are all of your *advisory affiliates* and any *person* that is under common *control* with you.

You have a *related person* that is a (check all that apply):

- (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)
- (2) other investment adviser (including financial planners)
- (3) registered municipal advisor
- (4) registered security-based swap dealer
- (5) major security-based swap participant
- (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (7) futures commission merchant
- (8) banking or thrift institution
- (9) trust company
- (10) accountant or accounting firm
- (11) lawyer or law firm
- (12) insurance company or agency
- (13) pension consultant
- (14) real estate broker or dealer
- (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

*Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).*

*Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.*

*For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.*

*You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.*

*You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.*

## SECTION 7.A. Financial Industry Affiliations

Complete a separate Schedule D Section 7.A. for each *related person* listed in Item 7.A.

1. Legal Name of *Related Person*:

HARTFORD SINGAPORE PTE. LTD.

2. Primary Business Name of *Related Person*:

HARTFORD SINGAPORE PTE. LTD.

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a) broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b) other investment adviser (including financial planners)
- (c) registered municipal advisor
- (d) registered security-based swap dealer
- (e) major security-based swap participant
- (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g) futures commission merchant
- (h) banking or thrift institution

- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:  
 Number and Street 1: \_\_\_\_\_ Number and Street 2: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Country: \_\_\_\_\_ ZIP+4/Postal Code: \_\_\_\_\_  
 If this address is a private residence, check this box:

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption? \_\_\_\_\_

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.  
**Name of Country/English Name of Foreign Financial Regulatory Authority**  
 Singapore - Monetary Authority of Singapore

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
 MAXUM SPECIALTY SERVICES CORPORATION

2. Primary Business Name of *Related Person*:  
 MAXUM SPECIALTY SERVICES CORPORATION

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
 -  
 or  
 Other

4. *Related Person's*  
 (a) CRD Number (if any):  
 (b) CIK Number(s) (if any):  
 No Information Filed

5. *Related Person* is: (check all that apply)  
 (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer  
 (b)  other investment adviser (including financial planners)  
 (c)  registered municipal advisor  
 (d)  registered security-based swap dealer  
 (e)  major security-based swap participant  
 (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  
 (g)  futures commission merchant  
 (h)  banking or thrift institution  
 (i)  trust company  
 (j)  accountant or accounting firm  
 (k)  lawyer or law firm  
 (l)  insurance company or agency  
 (m)  pension consultant  
 (n)  real estate broker or dealer  
 (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

	Yes	No
(p) <input type="checkbox"/> sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	○	○
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	○	○
7. Are you and the <i>related person</i> under common <i>control</i> ?	○	○
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	○	○
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	○	○
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>custody</i> of your <i>clients</i> ' assets: Number and Street 1: _____ Number and Street 2: _____ City: _____ State: _____ Country: _____ ZIP+4/Postal Code: _____ If this address is a private residence, check this box: <input type="checkbox"/>	Yes	No
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	○	○
(b) If the answer is yes, under what exemption?	○	○
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	○	○
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	○	○
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	○	○
12. Do you and the <i>related person</i> share the same physical location?	○	○

	Yes	No
1. Legal Name of <i>Related Person</i> : NAVIGATORS MANAGEMENT COMPANY, INC.	○	○
2. Primary Business Name of <i>Related Person</i> : NAVIGATORS MANAGEMENT COMPANY, INC.	○	○
3. <i>Related Person</i> 's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other	○	○
4. <i>Related Person</i> 's (a) CRD Number (if any):  (b) CIK Number(s) (if any): No Information Filed	○	○
5. <i>Related Person</i> is: (check all that apply) (a) <input type="checkbox"/> broker-dealer, municipal securities dealer, or government securities broker or dealer (b) <input type="checkbox"/> other investment adviser (including financial planners) (c) <input type="checkbox"/> registered municipal advisor (d) <input type="checkbox"/> registered security-based swap dealer (e) <input type="checkbox"/> major security-based swap participant (f) <input type="checkbox"/> commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) <input type="checkbox"/> futures commission merchant (h) <input type="checkbox"/> banking or thrift institution (i) <input type="checkbox"/> trust company (j) <input type="checkbox"/> accountant or accounting firm (k) <input type="checkbox"/> lawyer or law firm (l) <input checked="" type="checkbox"/> insurance company or agency (m) <input type="checkbox"/> pension consultant (n) <input type="checkbox"/> real estate broker or dealer (o) <input type="checkbox"/> sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) <input type="checkbox"/> sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	○	○
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	○	○
7. Are you and the <i>related person</i> under common <i>control</i> ?	○	○
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	○	○

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients' funds or securities</i> that are maintained at the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients' assets</i> :		
Number and Street 1:	Number and Street 2:	
City:	State:	Country:
If this address is a private residence, check this box: <input type="checkbox"/>		
Yes <input type="radio"/> No <input checked="" type="radio"/>		
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, under what exemption?		
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	No Information Filed	
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
12. Do you and the <i>related person</i> share the same physical location?	<input type="radio"/>	<input checked="" type="radio"/>

1. Legal Name of *Related Person*:

NAVIGATORS UNDERWRITING LIMITED

2. Primary Business Name of *Related Person*:

NAVIGATORS UNDERWRITING LIMITED

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?

Yes  No

7. Are you and the *related person* under common *control*?

Yes  No

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

Yes  No

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients' funds or securities* that are maintained at the *related person*?

Yes  No

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients' assets*:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes  No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

Yes  No

(b) If the answer is yes, under what exemption?	<input type="radio"/>	<input checked="" type="radio"/>		
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	<input type="radio"/>	<input checked="" type="radio"/>		
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	<table border="1"> <tr> <td><b>Name of Country/English Name of Foreign Financial Regulatory Authority</b></td> </tr> <tr> <td>United Kingdom - Financial Conduct Authority</td> </tr> </table>		<b>Name of Country/English Name of Foreign Financial Regulatory Authority</b>	United Kingdom - Financial Conduct Authority
<b>Name of Country/English Name of Foreign Financial Regulatory Authority</b>				
United Kingdom - Financial Conduct Authority				
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input type="radio"/>	<input checked="" type="radio"/>		
12. Do you and the <i>related person</i> share the same physical location?	<input type="radio"/>	<input checked="" type="radio"/>		
<p>1. Legal Name of <i>Related Person</i>: HARTFORD INSURANCE, LTD.</p> <p>2. Primary Business Name of <i>Related Person</i>: HARTFORD INSURANCE, LTD.</p> <p>3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other</p> <p>4. <i>Related Person's</i> (a) CRD Number (if any): (b) CIK Number(s) (if any): No Information Filed</p> <p>5. <i>Related Person</i> is: (check all that apply)        (a) <input type="checkbox"/> broker-dealer, municipal securities dealer, or government securities broker or dealer        (b) <input type="checkbox"/> other investment adviser (including financial planners)        (c) <input type="checkbox"/> registered municipal advisor        (d) <input type="checkbox"/> registered security-based swap dealer        (e) <input type="checkbox"/> major security-based swap participant        (f) <input type="checkbox"/> commodity pool operator or commodity trading advisor (whether registered or exempt from registration)        (g) <input type="checkbox"/> futures commission merchant        (h) <input type="checkbox"/> banking or thrift institution        (i) <input type="checkbox"/> trust company        (j) <input type="checkbox"/> accountant or accounting firm        (k) <input type="checkbox"/> lawyer or law firm        (l) <input checked="" type="checkbox"/> insurance company or agency        (m) <input type="checkbox"/> pension consultant        (n) <input type="checkbox"/> real estate broker or dealer        (o) <input type="checkbox"/> sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles        (p) <input type="checkbox"/> sponsor, general partner, managing member (or equivalent) of pooled investment vehicles     </p>				
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>		
7. Are you and the <i>related person</i> under common <i>control</i> ?	<input type="radio"/>	<input checked="" type="radio"/>		
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ? (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ? (c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> ' assets: Number and Street 1: _____ Number and Street 2: _____ City: _____ State: _____ Country: _____ ZIP+4/Postal Code: _____ If this address is a private residence, check this box: <input type="checkbox"/>	<table> <tr> <td><b>Yes</b></td> <td><b>No</b></td> </tr> </table>		<b>Yes</b>	<b>No</b>
<b>Yes</b>	<b>No</b>			
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration? (b) If the answer is yes, under what exemption?	<input type="radio"/>	<input checked="" type="radio"/>		
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? (b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	<table border="1"> <tr> <td><b>Name of Country/English Name of Foreign Financial Regulatory Authority</b></td> </tr> <tr> <td>Bermuda - Bermuda Monetary Authority</td> </tr> </table>		<b>Name of Country/English Name of Foreign Financial Regulatory Authority</b>	Bermuda - Bermuda Monetary Authority
<b>Name of Country/English Name of Foreign Financial Regulatory Authority</b>				
Bermuda - Bermuda Monetary Authority				
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input type="radio"/>	<input checked="" type="radio"/>		

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY

2. Primary Business Name of *Related Person*:  
HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-  
or  
Other

4. *Related Person's*  
(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes  No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:  Number and Street 2:

City:  State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes  No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
HARTFORD INSURANCE COMPANY OF THE MIDWEST

2. Primary Business Name of *Related Person*:  
HARTFORD INSURANCE COMPANY OF THE MIDWEST

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-  
or  
Other

4. *Related Person's*  
(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?    
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?    
(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:  
Number and Street 1: \_\_\_\_\_ Number and Street 2: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Country: \_\_\_\_\_ ZIP+4/Postal Code: \_\_\_\_\_  
If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?    
(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.  
No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
HARTFORD CASUALTY GENERAL AGENCY, INC.

2. Primary Business Name of *Related Person*:  
HARTFORD CASUALTY GENERAL AGENCY, INC.

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-  
or  
Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

HARTFORD UNDERWRITERS GENERAL AGENCY, INC.

2. Primary Business Name of *Related Person*:

HARTFORD UNDERWRITERS GENERAL AGENCY, INC.

3. *Related Person*'s SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person*'s

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)

- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes  No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:

Number and Street 1: Number and Street 2:

City: Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes  No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

HARTFORD FUNDS MANAGEMENT COMPANY, LLC

2. Primary Business Name of *Related Person*:

HARTFORD FUNDS

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

801 - 77209

or

Other

4. *Related Person's*

(a) CRD Number (if any):

147746

(b) CIK Number(s) (if any):

**CIK Number**

1546587

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company

- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?

Yes  No

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:

Number and Street 1: \_\_\_\_\_ Number and Street 2: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_

Country: \_\_\_\_\_

ZIP+4/Postal Code: \_\_\_\_\_

If this address is a private residence, check this box:

Yes  No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

HARTFORD FIRE INSURANCE COMPANY

2. Primary Business Name of *Related Person*:

HARTFORD FIRE INSURANCE COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes  No

6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	<input type="radio"/> <input checked="" type="radio"/>		
7. Are you and the <i>related person</i> under common <i>control</i> ?	<input checked="" type="radio"/> <input type="radio"/>		
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	<input type="radio"/> <input checked="" type="radio"/>		
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	<input type="radio"/> <input checked="" type="radio"/>		
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>custody</i> of your <i>clients</i> ' assets:			
Number and Street 1:	Number and Street 2:		
City: _____	State: _____	Country: _____	ZIP+4/Postal Code: _____
If this address is a private residence, check this box: <input type="checkbox"/>			
	<b>Yes</b> <b>No</b>		
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	<input type="radio"/> <input checked="" type="radio"/>		
(b) If the answer is yes, under what exemption?	<input type="radio"/> <input checked="" type="radio"/>		
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	<input type="radio"/> <input checked="" type="radio"/>		
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	No Information Filed		
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input type="radio"/> <input checked="" type="radio"/>		
12. Do you and the <i>related person</i> share the same physical location?	<input type="radio"/> <input checked="" type="radio"/>		

1. Legal Name of <i>Related Person</i> :	NEW ENGLAND REINSURANCE CORPORATION
2. Primary Business Name of <i>Related Person</i> :	NEW ENGLAND REINSURANCE CORPORATION
3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	- or Other
4. <i>Related Person's</i>	
(a) CRD Number (if any):	
(b) CIK Number(s) (if any):	No Information Filed
5. <i>Related Person</i> is: (check all that apply)	
(a) <input type="checkbox"/> broker-dealer, municipal securities dealer, or government securities broker or dealer	
(b) <input type="checkbox"/> other investment adviser (including financial planners)	
(c) <input type="checkbox"/> registered municipal advisor	
(d) <input type="checkbox"/> registered security-based swap dealer	
(e) <input type="checkbox"/> major security-based swap participant	
(f) <input type="checkbox"/> commodity pool operator or commodity trading advisor (whether registered or exempt from registration)	
(g) <input type="checkbox"/> futures commission merchant	
(h) <input type="checkbox"/> banking or thrift institution	
(i) <input type="checkbox"/> trust company	
(j) <input type="checkbox"/> accountant or accounting firm	
(k) <input type="checkbox"/> lawyer or law firm	
(l) <input checked="" type="checkbox"/> insurance company or agency	
(m) <input type="checkbox"/> pension consultant	
(n) <input type="checkbox"/> real estate broker or dealer	
(o) <input type="checkbox"/> sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles	
(p) <input type="checkbox"/> sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	
	<b>Yes</b> <b>No</b>
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	<input type="radio"/> <input checked="" type="radio"/>
7. Are you and the <i>related person</i> under common <i>control</i> ?	<input checked="" type="radio"/> <input type="radio"/>
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	<input type="radio"/> <input checked="" type="radio"/>
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	<input type="radio"/> <input checked="" type="radio"/>

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients' assets*:  
Number and Street 1: \_\_\_\_\_ Number and Street 2: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Country: \_\_\_\_\_ ZIP+4/Postal Code: \_\_\_\_\_  
If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?    
(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?    
(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.  
No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
HARTFORD INSURANCE COMPANY OF ILLINOIS

2. Primary Business Name of *Related Person*:  
HARTFORD INSURANCE COMPANY OF ILLINOIS

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-  
or  
Other

4. *Related Person's*  
(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a)  broker-dealer, municipal securities dealer, or government securities broker or dealer  
(b)  other investment adviser (including financial planners)  
(c)  registered municipal advisor  
(d)  registered security-based swap dealer  
(e)  major security-based swap participant  
(f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  
(g)  futures commission merchant  
(h)  banking or thrift institution  
(i)  trust company  
(j)  accountant or accounting firm  
(k)  lawyer or law firm  
(l)  insurance company or agency  
(m)  pension consultant  
(n)  real estate broker or dealer  
(o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  
(p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?    
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients' funds* or securities that are maintained at the *related person*?    
(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients' assets*:

Number and Street 1: \_\_\_\_\_ Number and Street 2: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Country: \_\_\_\_\_ ZIP+4/Postal Code: \_\_\_\_\_  
If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?    
(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?  
(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

HARTFORD OF TEXAS GENERAL AGENCY, INC.

2. Primary Business Name of *Related Person*:

HARTFORD OF TEXAS GENERAL AGENCY, INC.

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a)  broker-dealer, municipal securities dealer, or government securities broker or dealer  
(b)  other investment adviser (including financial planners)  
(c)  registered municipal advisor  
(d)  registered security-based swap dealer  
(e)  major security-based swap participant  
(f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  
(g)  futures commission merchant  
(h)  banking or thrift institution  
(i)  trust company  
(j)  accountant or accounting firm  
(k)  lawyer or law firm  
(l)  insurance company or agency  
(m)  pension consultant  
(n)  real estate broker or dealer  
(o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  
(p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
HARTFORD LLOYD'S INSURANCE COMPANY
2. Primary Business Name of *Related Person*:  
HARTFORD LLOYD'S INSURANCE COMPANY
3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-  
or  
Other

4. *Related Person's*
  - (a) CRD Number (if any):
  - (b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)
  - (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
  - (b)  other investment adviser (including financial planners)
  - (c)  registered municipal advisor
  - (d)  registered security-based swap dealer
  - (e)  major security-based swap participant
  - (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
  - (g)  futures commission merchant
  - (h)  banking or thrift institution
  - (i)  trust company
  - (j)  accountant or accounting firm
  - (k)  lawyer or law firm
  - (l)  insurance company or agency
  - (m)  pension consultant
  - (n)  real estate broker or dealer
  - (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
  - (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?
- (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?
- (c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:

Number and Street 1: \_\_\_\_\_ Number and Street 2: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Country: \_\_\_\_\_ ZIP+4/Postal Code: \_\_\_\_\_  
If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?
- (b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?
- (b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.  
No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
HARTFORD UNDERWRITERS INSURANCE COMPANY
2. Primary Business Name of *Related Person*:  
HARTFORD UNDERWRITERS INSURANCE COMPANY
3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-

or  
Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person is:* (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:

Number and Street 1:  Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

HARTFORD ACCIDENT AND INDEMNITY COMPANY

2. Primary Business Name of *Related Person*:

HARTFORD ACCIDENT AND INDEMNITY COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes  No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:  
 Number and Street 1: \_\_\_\_\_ Number and Street 2: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Country: \_\_\_\_\_ ZIP+4/Postal Code: \_\_\_\_\_  
 If this address is a private residence, check this box:

Yes  No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

Y-RISK, LLC

2. Primary Business Name of *Related Person*:

Y-RISK, LLC

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant

- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:

Number and Street 1: \_\_\_\_\_ Number and Street 2: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Country: \_\_\_\_\_ ZIP+4/Postal Code: \_\_\_\_\_  
 If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.  
 No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD

2. Primary Business Name of *Related Person*:

PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

	Yes	No
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
7. Are you and the <i>related person</i> under common <i>control</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>custody</i> of your <i>clients</i> ' assets: Number and Street 1: _____ Number and Street 2: _____ City: _____ State: _____ Country: _____ ZIP+4/Postal Code: _____ If this address is a private residence, check this box: <input type="checkbox"/>	Number and Street 1: _____ Number and Street 2: _____ City: _____ State: _____ Country: _____ ZIP+4/Postal Code: _____ If this address is a private residence, check this box: <input type="checkbox"/>	
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, under what exemption?	<input type="radio"/>	
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	No Information Filed	
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
12. Do you and the <i>related person</i> share the same physical location?	<input type="radio"/>	<input checked="" type="radio"/>

	Yes	No
1. Legal Name of <i>Related Person</i> : NEW OCEAN INSURANCE COMPANY, LTD.		
2. Primary Business Name of <i>Related Person</i> : NEW OCEAN INSURANCE COMPANY, LTD.		
3. <i>Related Person</i> 's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other		
4. <i>Related Person</i> 's (a) CRD Number (if any):  (b) CIK Number(s) (if any):	No Information Filed	
5. <i>Related Person</i> is: (check all that apply) (a) <input type="checkbox"/> broker-dealer, municipal securities dealer, or government securities broker or dealer (b) <input type="checkbox"/> other investment adviser (including financial planners) (c) <input type="checkbox"/> registered municipal advisor (d) <input type="checkbox"/> registered security-based swap dealer (e) <input type="checkbox"/> major security-based swap participant (f) <input type="checkbox"/> commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) <input type="checkbox"/> futures commission merchant (h) <input type="checkbox"/> banking or thrift institution (i) <input type="checkbox"/> trust company (j) <input type="checkbox"/> accountant or accounting firm (k) <input type="checkbox"/> lawyer or law firm (l) <input checked="" type="checkbox"/> insurance company or agency (m) <input type="checkbox"/> pension consultant (n) <input type="checkbox"/> real estate broker or dealer (o) <input type="checkbox"/> sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) <input type="checkbox"/> sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
7. Are you and the <i>related person</i> under common <i>control</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>

examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority
Bermuda - Bermuda Monetary Authority

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

MAXUM CASUALTY INSURANCE COMPANY

2. Primary Business Name of *Related Person*:

MAXUM CASUALTY INSURANCE COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a)  broker-dealer, municipal securities dealer, or government securities broker or dealer  
(b)  other investment adviser (including financial planners)  
(c)  registered municipal advisor  
(d)  registered security-based swap dealer  
(e)  major security-based swap participant  
(f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  
(g)  futures commission merchant  
(h)  banking or thrift institution  
(i)  trust company  
(j)  accountant or accounting firm  
(k)  lawyer or law firm  
(l)  insurance company or agency  
(m)  pension consultant  
(n)  real estate broker or dealer  
(o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  
(p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.  
No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
NUTMEG INSURANCE COMPANY

2. Primary Business Name of *Related Person*:  
NUTMEG INSURANCE COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-  
or  
Other

4. *Related Person's*  
(a) CRD Number (if any):  
(b) CIK Number(s) (if any):  
No Information Filed

5. *Related Person* is: (check all that apply)  
 broker-dealer, municipal securities dealer, or government securities broker or dealer  
 other investment adviser (including financial planners)  
 registered municipal advisor  
 registered security-based swap dealer  
 major security-based swap participant  
 commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  
 futures commission merchant  
 banking or thrift institution  
 trust company  
 accountant or accounting firm  
 lawyer or law firm  
 insurance company or agency  
 pension consultant  
 real estate broker or dealer  
 sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  
 sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?    
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?    
(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:  
Number and Street 1: \_\_\_\_\_ Number and Street 2: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Country: \_\_\_\_\_ ZIP+4/Postal Code: \_\_\_\_\_  
If this address is a private residence, check this box:

9. (a) If the *related person* is an investment adviser, is it exempt from registration?    
(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?    
(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.  
No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
HARTFORD CASUALTY INSURANCE COMPANY

2. Primary Business Name of *Related Person*:  
HARTFORD CASUALTY INSURANCE COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-  
or  
Other

4. *Related Person's*  
(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*? Yes  No

7. Are you and the *related person* under common *control*? Yes  No

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*? Yes  No

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*? Yes  No

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients' assets*:

Number and Street 1: Number and Street 2:

City: Country:

If this address is a private residence, check this box:

9. (a) If the *related person* is an investment adviser, is it exempt from registration? Yes  No

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*? Yes  No

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*? Yes  No

12. Do you and the *related person* share the same physical location? Yes  No

1. Legal Name of *Related Person*:  
HARTFORD FIRE GENERAL AGENCY, INC.

2. Primary Business Name of *Related Person*:  
HARTFORD FIRE GENERAL AGENCY, INC.

3. *Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)*

-  
or  
Other

4. *Related Person's*

(a) *CRD Number (if any):*

(b) *CIK Number(s) (if any):*

No Information Filed

5. *Related Person is: (check all that apply)*

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:

Number and Street 1:  Number and Street 2:

City:  State:  Country:  ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

TRUMBULL INSURANCE COMPANY

2. Primary Business Name of *Related Person*:

TRUMBULL INSURANCE COMPANY

3. *Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)*

-  
or  
Other

4. *Related Person's*

(a) *CRD Number (if any):*

(b) *CIK Number(s) (if any):*

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?  7. Are you and the *related person* under common *control*?  8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?  

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: 

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?  

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?  

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.  
No Information Filed

11. Do you and the *related person* share any *supervised persons*?  12. Do you and the *related person* share the same physical location?  1. Legal Name of *Related Person*:

NUTMEG INSURANCE AGENCY, INC.

2. Primary Business Name of *Related Person*:

NUTMEG INSURANCE AGENCY, INC.

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant

- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes  No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:

Number and Street 1: Number and Street 2:

City: Country:

State: ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes  No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

PACIFIC INSURANCE COMPANY, LIMITED

2. Primary Business Name of *Related Person*:

PACIFIC INSURANCE COMPANY, LIMITED

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer

(o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  
 (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

HARTFORD INSURANCE COMPANY OF THE SOUTHEAST

2. Primary Business Name of *Related Person*:

HARTFORD INSURANCE COMPANY OF THE SOUTHEAST

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a)  broker-dealer, municipal securities dealer, or government securities broker or dealer  
 (b)  other investment adviser (including financial planners)  
 (c)  registered municipal advisor  
 (d)  registered security-based swap dealer  
 (e)  major security-based swap participant  
 (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  
 (g)  futures commission merchant  
 (h)  banking or thrift institution  
 (i)  trust company  
 (j)  accountant or accounting firm  
 (k)  lawyer or law firm  
 (l)  insurance company or agency  
 (m)  pension consultant  
 (n)  real estate broker or dealer  
 (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  
 (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients' funds or securities</i> that are maintained at the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients' assets</i> :		
Number and Street 1:	Number and Street 2:	
City:	State:	Country:
If this address is a private residence, check this box: <input type="checkbox"/>		
Yes <input type="radio"/> No <input checked="" type="radio"/>		
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, under what exemption?		
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	No Information Filed	
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
12. Do you and the <i>related person</i> share the same physical location?	<input type="radio"/>	<input checked="" type="radio"/>

1. Legal Name of *Related Person*:  
NEW ENGLAND INSURANCE COMPANY

2. Primary Business Name of *Related Person*:  
NEW ENGLAND INSURANCE COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-  
or  
Other

4. *Related Person's*  
(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?  
 (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients' funds or securities* that are maintained at the *related person*?  
 (c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients' assets*:

Number and Street 1:	Number and Street 2:	
City:	State:	Country:
If this address is a private residence, check this box: <input type="checkbox"/>		

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

Yes  No

Yes  No

Yes  No

(b) If the answer is yes, under what exemption?	<input type="radio"/>	<input checked="" type="radio"/>
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	No Information Filed	
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
12. Do you and the <i>related person</i> share the same physical location?	<input type="radio"/>	<input checked="" type="radio"/>
1. Legal Name of <i>Related Person</i> :	TWIN CITY FIRE INSURANCE COMPANY	
2. Primary Business Name of <i>Related Person</i> :	TWIN CITY FIRE INSURANCE COMPANY	
3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	-	
	or	
	Other	
4. <i>Related Person's</i>		
(a) CRD Number (if any):		
(b) CIK Number(s) (if any):	No Information Filed	
5. <i>Related Person</i> is: (check all that apply)		
(a) <input type="checkbox"/> broker-dealer, municipal securities dealer, or government securities broker or dealer		
(b) <input type="checkbox"/> other investment adviser (including financial planners)		
(c) <input type="checkbox"/> registered municipal advisor		
(d) <input type="checkbox"/> registered security-based swap dealer		
(e) <input type="checkbox"/> major security-based swap participant		
(f) <input type="checkbox"/> commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
(g) <input type="checkbox"/> futures commission merchant		
(h) <input type="checkbox"/> banking or thrift institution		
(i) <input type="checkbox"/> trust company		
(j) <input type="checkbox"/> accountant or accounting firm		
(k) <input type="checkbox"/> lawyer or law firm		
(l) <input checked="" type="checkbox"/> insurance company or agency		
(m) <input type="checkbox"/> pension consultant		
(n) <input type="checkbox"/> real estate broker or dealer		
(o) <input type="checkbox"/> sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
(p) <input type="checkbox"/> sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
Yes <input type="radio"/> No <input checked="" type="radio"/>		
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
7. Are you and the <i>related person</i> under common <i>control</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> ' assets:		
Number and Street 1:	Number and Street 2:	
City:	State:	Country:
ZIP+4/Postal Code:		
If this address is a private residence, check this box: <input type="checkbox"/>		
Yes <input type="radio"/> No <input checked="" type="radio"/>		
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, under what exemption?	<input type="radio"/>	<input checked="" type="radio"/>
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	No Information Filed	
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
12. Do you and the <i>related person</i> share the same physical location?	<input type="radio"/>	<input checked="" type="radio"/>

1. Legal Name of *Related Person*:  
LATTICE STRATEGIES LLC
2. Primary Business Name of *Related Person*:  
HARTFORD FUNDS
3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
801 - 63451  
or  
Other

4. *Related Person's*
  - (a) CRD Number (if any):  
130373
  - (b) CIK Number(s) (if any):  

CIK Number
1540945

5. *Related Person* is: (check all that apply)
  - (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
  - (b)  other investment adviser (including financial planners)
  - (c)  registered municipal advisor
  - (d)  registered security-based swap dealer
  - (e)  major security-based swap participant
  - (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
  - (g)  futures commission merchant
  - (h)  banking or thrift institution
  - (i)  trust company
  - (j)  accountant or accounting firm
  - (k)  lawyer or law firm
  - (l)  insurance company or agency
  - (m)  pension consultant
  - (n)  real estate broker or dealer
  - (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
  - (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

	Yes	No
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
7. Are you and the <i>related person</i> under common <i>control</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ? (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ? (c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> ' assets: Number and Street 1: _____ Number and Street 2: _____ City: _____ State: _____ Country: _____ ZIP+4/Postal Code: _____ If this address is a private residence, check this box: <input type="checkbox"/>	<input type="radio"/>	<input checked="" type="radio"/>
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration? (b) If the answer is yes, under what exemption?	<input type="radio"/>	<input checked="" type="radio"/>
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? (b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	<input type="radio"/>	<input checked="" type="radio"/>
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
12. Do you and the <i>related person</i> share the same physical location?	<input type="radio"/>	<input checked="" type="radio"/>

1. Legal Name of *Related Person*:  
SENTINEL INSURANCE COMPANY, LTD.
2. Primary Business Name of *Related Person*:  
SENTINEL INSURANCE COMPANY, LTD.

3. *Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)*  
-  
or  
Other

4. *Related Person's*

(a) *CRD Number (if any):*

(b) *CIK Number(s) (if any):*

No Information Filed

5. *Related Person is: (check all that apply)*

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

HERITAGE REINSURANCE COMPANY, LTD.

2. Primary Business Name of *Related Person*:

HERITAGE REINSURANCE COMPANY, LTD.

3. *Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)*  
-  
or  
Other

4. *Related Person's*

(a) *CRD Number (if any):*

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

**Name of Country/English Name of Foreign Financial Regulatory Authority**

Bermuda - Bermuda Monetary Authority

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

HARTFORD OF THE SOUTHEAST GENERAL AGENCY, INC.

2. Primary Business Name of *Related Person*:

HARTFORD OF THE SOUTHEAST GENERAL AGENCY, INC.

3. *Related Person*'s SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person*'s

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)

- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes  No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:

Number and Street 1: Number and Street 2:

City: Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes  No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

MAXUM INDEMNITY COMPANY

2. Primary Business Name of *Related Person*:

MAXUM INDEMNITY COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm

- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:  
 Number and Street 1: \_\_\_\_\_ Number and Street 2: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Country: \_\_\_\_\_ ZIP+4/Postal Code: \_\_\_\_\_  
 If this address is a private residence, check this box:

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption? \_\_\_\_\_

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.  
 No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
 HARTFORD SPECIALTY INSURANCE SERVICES OF TEXAS, LLC

2. Primary Business Name of *Related Person*:  
 HARTFORD SPECIALTY INSURANCE SERVICES OF TEXAS, LLC

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
 -  
 or  
 Other

4. *Related Person's*  
 (a) CRD Number (if any): \_\_\_\_\_  
 (b) CIK Number(s) (if any): \_\_\_\_\_  
 No Information Filed

5. *Related Person* is: (check all that apply)  
 (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer  
 (b)  other investment adviser (including financial planners)  
 (c)  registered municipal advisor  
 (d)  registered security-based swap dealer  
 (e)  major security-based swap participant  
 (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  
 (g)  futures commission merchant  
 (h)  banking or thrift institution  
 (i)  trust company  
 (j)  accountant or accounting firm  
 (k)  lawyer or law firm  
 (l)  insurance company or agency  
 (m)  pension consultant  
 (n)  real estate broker or dealer  
 (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  
 (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the <i>related person</i> under common control?	<input checked="" type="radio"/>	<input type="radio"/>
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients' assets</i> :		
Number and Street 1:	Number and Street 2:	
City:	State:	Country:
ZIP+4/Postal Code:		
If this address is a private residence, check this box: <input type="checkbox"/>		
	Yes	No
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, under what exemption?		
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	No Information Filed	
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
12. Do you and the <i>related person</i> share the same physical location?	<input type="radio"/>	<input checked="" type="radio"/>

1. Legal Name of <i>Related Person</i> :	NAVIGATORS INSURANCE COMPANY	
2. Primary Business Name of <i>Related Person</i> :	NAVIGATORS INSURANCE COMPANY	
3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	-	
	or	
	Other	
4. <i>Related Person's</i>		
(a) CRD Number (if any):		
(b) CIK Number(s) (if any):	No Information Filed	
5. <i>Related Person</i> is: (check all that apply)		
(a) <input type="checkbox"/> broker-dealer, municipal securities dealer, or government securities broker or dealer		
(b) <input type="checkbox"/> other investment adviser (including financial planners)		
(c) <input type="checkbox"/> registered municipal advisor		
(d) <input type="checkbox"/> registered security-based swap dealer		
(e) <input type="checkbox"/> major security-based swap participant		
(f) <input type="checkbox"/> commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
(g) <input type="checkbox"/> futures commission merchant		
(h) <input type="checkbox"/> banking or thrift institution		
(i) <input type="checkbox"/> trust company		
(j) <input type="checkbox"/> accountant or accounting firm		
(k) <input type="checkbox"/> lawyer or law firm		
(l) <input checked="" type="checkbox"/> insurance company or agency		
(m) <input type="checkbox"/> pension consultant		
(n) <input type="checkbox"/> real estate broker or dealer		
(o) <input type="checkbox"/> sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
(p) <input type="checkbox"/> sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	Yes	No
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
7. Are you and the <i>related person</i> under common <i>control</i> ?	<input checked="" type="radio"/>	<input type="radio"/>
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients' assets</i> :		
Number and Street 1:	Number and Street 2:	

City: State: If this address is a private residence, check this box:

Country: ZIP+4/Postal Code:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?  
(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?  
(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority
United Kingdom - Financial Conduct Authority
United Kingdom - Prudential Regulation Authority

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

HARTFORD ASIA LIMITED

2. Primary Business Name of *Related Person*:

HARTFORD ASIA LIMITED

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a)  broker-dealer, municipal securities dealer, or government securities broker or dealer  
(b)  other investment adviser (including financial planners)  
(c)  registered municipal advisor  
(d)  registered security-based swap dealer  
(e)  major security-based swap participant  
(f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  
(g)  futures commission merchant  
(h)  banking or thrift institution  
(i)  trust company  
(j)  accountant or accounting firm  
(k)  lawyer or law firm  
(l)  insurance company or agency  
(m)  pension consultant  
(n)  real estate broker or dealer  
(o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  
(p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	<input type="radio"/>	<input checked="" type="radio"/>			
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	<table border="1"> <tr> <td><b>Name of Country/English Name of Foreign Financial Regulatory Authority</b></td> </tr> <tr> <td>Other - HONG KONG INSURANCE AUTHORITY</td> </tr> </table>		<b>Name of Country/English Name of Foreign Financial Regulatory Authority</b>	Other - HONG KONG INSURANCE AUTHORITY	
<b>Name of Country/English Name of Foreign Financial Regulatory Authority</b>					
Other - HONG KONG INSURANCE AUTHORITY					
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input type="radio"/>	<input checked="" type="radio"/>			
12. Do you and the <i>related person</i> share the same physical location?	<input type="radio"/>	<input checked="" type="radio"/>			
<p>1. Legal Name of <i>Related Person</i>: HARTFORD UNDERWRITING AGENCY LIMITED</p> <p>2. Primary Business Name of <i>Related Person</i>: HARTFORD UNDERWRITING AGENCY LIMITED</p> <p>3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other</p> <p>4. <i>Related Person's</i> (a) CRD Number (if any): (b) CIK Number(s) (if any): No Information Filed</p> <p>5. <i>Related Person</i> is: (check all that apply)</p> <p>(a) <input type="checkbox"/> broker-dealer, municipal securities dealer, or government securities broker or dealer (b) <input type="checkbox"/> other investment adviser (including financial planners) (c) <input type="checkbox"/> registered municipal advisor (d) <input type="checkbox"/> registered security-based swap dealer (e) <input type="checkbox"/> major security-based swap participant (f) <input type="checkbox"/> commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) <input type="checkbox"/> futures commission merchant (h) <input type="checkbox"/> banking or thrift institution (i) <input type="checkbox"/> trust company (j) <input type="checkbox"/> accountant or accounting firm (k) <input type="checkbox"/> lawyer or law firm (l) <input checked="" type="checkbox"/> insurance company or agency (m) <input type="checkbox"/> pension consultant (n) <input type="checkbox"/> real estate broker or dealer (o) <input type="checkbox"/> sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) <input type="checkbox"/> sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</p>					
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>			
7. Are you and the <i>related person</i> under common <i>control</i> ?	<input checked="" type="radio"/>	<input type="radio"/>			
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ? (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ? (c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> ' assets: Number and Street 1: _____ Number and Street 2: _____ City: _____ State: _____ Country: _____ ZIP+4/Postal Code: _____ If this address is a private residence, check this box: <input type="checkbox"/>	<input type="radio"/>	<input checked="" type="radio"/>			
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration? (b) If the answer is yes, under what exemption?	<input type="radio"/>	<input checked="" type="radio"/>			
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? (b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	<table border="1"> <tr> <td><b>Name of Country/English Name of Foreign Financial Regulatory Authority</b></td> </tr> <tr> <td>United Kingdom - Financial Conduct Authority</td> </tr> <tr> <td>United Kingdom - Prudential Regulation Authority</td> </tr> </table>		<b>Name of Country/English Name of Foreign Financial Regulatory Authority</b>	United Kingdom - Financial Conduct Authority	United Kingdom - Prudential Regulation Authority
<b>Name of Country/English Name of Foreign Financial Regulatory Authority</b>					
United Kingdom - Financial Conduct Authority					
United Kingdom - Prudential Regulation Authority					
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	<input type="radio"/>	<input checked="" type="radio"/>			

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
HARTFORD FUNDS DISTRIBUTORS, LLC

2. Primary Business Name of *Related Person*:  
HARTFORD FUNDS DISTRIBUTORS, LLC

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
8 - 51290

or  
Other

4. *Related Person's*  
(a) CRD Number (if any):  
45995

(b) CIK Number(s) (if any):

CIK Number
1071060

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

FIRST STATE INSURANCE COMPANY

2. Primary Business Name of *Related Person*:  
FIRST STATE INSURANCE COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-  
or  
Other

4. *Related Person's*  
(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?    
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?    
(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients*' assets:

Number and Street 1:  Number and Street 2:

City:  State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?    
(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?    
(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.  
No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:  
NAVIGATORS SPECIALTY INSURANCE COMPANY

2. Primary Business Name of *Related Person*:  
NAVIGATORS SPECIALTY INSURANCE COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
-  
or  
Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)  other investment adviser (including financial planners)
- (c)  registered municipal advisor
- (d)  registered security-based swap dealer
- (e)  major security-based swap participant
- (f)  commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)  futures commission merchant
- (h)  banking or thrift institution
- (i)  trust company
- (j)  accountant or accounting firm
- (k)  lawyer or law firm
- (l)  insurance company or agency
- (m)  pension consultant
- (n)  real estate broker or dealer
- (o)  sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients*' funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person*'s office responsible for *custody* of your *clients*' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority*?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

**Item 7 Private Fund Reporting**

Yes No

B. Are you an adviser to any *private fund*?

If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.

In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designation in place of the fund's name.

**SECTION 7.B.(1) Private Fund Reporting**

Funds per Page: 15 Total Funds: 13

A. PRIVATE FUND

**Information About the Private Fund**

1. (a) Name of the *private fund*:

HIMCO 30 YEAR MBS / ABS INDEX DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-4651137460

2. Under the laws of what state or country is the *private fund* organized:

State:  
Connecticut

Country:  
United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

Yes No

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

Yes No

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

*Private fund* identification number:  
(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

Yes No

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

Yes No

10. What type of fund is the *private fund*?

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 6,933,569,253

#### Ownership

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes  No

(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

#### Your Advisory Services

Yes  No

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

Yes  No

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

Yes  No

19. Are your *clients* solicited to invest in the *private fund*?

NOTE: For purposes of this question, do not consider *feeder funds* of the *private fund*.

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### Private Offering

Yes  No

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

Form D file number

021-53126

#### B. SERVICE PROVIDERS

#### Auditors

Yes  No

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

Yes  No  Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

#### **Prime Broker**

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

Yes No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

#### **Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:

STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:

STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

Yes No

(e) Is the custodian a *related person* of your firm?

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):

-

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

571474TGEMMWANRLN572

#### **Administrator**

Yes No

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

**Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:

STATE STREET BANK AND TRUST COMPANY

(c) Location of administrator (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

Yes No

(d) Is the administrator a *related person* of your firm?

(e) Does the administrator prepare and send investor account statements to the *private fund's* investors?

Yes (provided to all investors)  Some (provided to some but not all investors)  No (provided to no investors)

(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

**Marketers**

Yes No

28. (a) Does the *private fund* use the services of someone other than you or your employees for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

**A. PRIVATE FUND****Information About the Private Fund**

1. (a) Name of the *private fund*:

HIMCO 30 YEAR NEW MBS / ABS INDEX DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:  
(include the "805-" prefix also)

805-9959427203

2. Under the laws of what state or country is the *private fund* organized:

State: Connecticut Country: United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser*(s) that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

Yes No

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

Yes No

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

*Private fund* identification number:

(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

Yes No

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

Yes No

10. What type of fund is the *private fund*?

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 2,113,821,543

#### Ownership

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund*'s beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes No

(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

#### **Your Advisory Services**

Yes No

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

Yes No

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

Yes No

19. Are your *clients* solicited to invest in the *private fund*?

*NOTE: For purposes of this question, do not consider feeder funds of the private fund.*

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### **Private Offering**

Yes No

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

No Information Filed

#### **B. SERVICE PROVIDERS**

##### **Auditors**

Yes No

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?  Yes  No  Report Not Yet Received

*If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.*

##### **Prime Broker**

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

**Custodian****Yes No**

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

**Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:

STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:

STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

**Yes No**

(e) Is the custodian a *related person* of your firm?

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):

-

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

571474TGEMMWANRLN572

**Administrator****Yes No**

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

**Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:

STATE STREET BANK AND TRUST COMPANY

(c) Location of administrator (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

**Yes No**

(d) Is the administrator a *related person* of your firm?

(e) Does the administrator prepare and send investor account statements to the *private fund's* investors?

Yes (provided to all investors)  Some (provided to some but not all investors)  No (provided to no investors)

(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

**Marketers**

Yes No

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

**A. PRIVATE FUND**

**Information About the Private Fund**

1. (a) Name of the *private fund*:

HIMCO BB HIGH YIELD DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-7225222789

2. Under the laws of what state or country is the *private fund* organized:

State:  
Connecticut

Country:  
United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

Yes No

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

Yes No

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

*Private fund* identification number:  
(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

Yes No

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 222,257,452

#### Ownership

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes No

(b) If the *private fund* qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

#### Your Advisory Services

Yes No

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

Yes No

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

Yes No

19. Are your *clients* solicited to invest in the *private fund*?

NOTE: For purposes of this question, do not consider *feeder funds* of the *private fund*.

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

**Private Offering**

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

No Information Filed

**B. SERVICE PROVIDERS**

**Auditors**

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

Yes  No  Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

**Prime Broker**

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

**Custodian**

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

**Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:

STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:

STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

(e) Is the custodian a *related person* of your firm?

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):  
-

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

571474TGEMMWANRLN572

#### Administrator

Yes No

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

#### **Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:

STATE STREET BANK AND TRUST COMPANY

(c) Location of administrator (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

Yes No

(d) Is the administrator a *related person* of your firm?

(e) Does the administrator prepare and send investor account statements to the *private fund's* investors?

Yes (provided to all investors)  Some (provided to some but not all investors)  No (provided to no investors)

(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

#### Marketers

Yes No

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

#### A. PRIVATE FUND

##### Information About the Private Fund

1. (a) Name of the *private fund*:

HIMCO DURATION MATCHED DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-4181059228

2. Under the laws of what state or country is the *private fund* organized:

State:  
Connecticut

Country:  
United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

Yes No

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

Yes No

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

*Private fund* identification number:

(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

Yes No

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 21,656,503

#### Ownership

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes No

(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

#### Your Advisory Services

Yes No

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

Yes No

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

Yes No

19. Are your *clients* solicited to invest in the *private fund*?

NOTE: For purposes of this question, do not consider *feeder funds* of the *private fund*.

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### Private Offering

Yes No

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

No Information Filed

#### B. SERVICE PROVIDERS

##### Auditors

Yes No

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

Yes  No  Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

#### Prime Broker

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

#### Custodian

Yes No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

#### **Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:

STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:

STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

Yes No

(e) Is the custodian a *related person* of your firm?

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):

-

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

571474TGEMMWANRLN572

#### Administrator

Yes No

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

#### **Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:

STATE STREET BANK AND TRUST COMPANY

(c) Location of administrator (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

Yes No

(d) Is the administrator a *related person* of your firm?

(e) Does the administrator prepare and send investor account statements to the *private fund's* investors?

Yes (provided to all investors)  Some (provided to some but not all investors)  No (provided to no investors)

(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

#### **Marketers**

Yes No

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

#### **A. PRIVATE FUND**

##### **Information About the Private Fund**

1. (a) Name of the *private fund*:

HIMCO GOVERNMENT MONEY MARKET DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-9963035044

2. Under the laws of what state or country is the *private fund* organized:

State:  
Connecticut

Country:  
United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

Yes No

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

(c) Is this a "feeder fund" in a master-feeder arrangement? Yes  No

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

*Private fund* identification number:  
(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*:

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 166,393,935

#### **Ownership**

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes  No

(b) If the *private fund* qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

#### **Your Advisory Services**

Yes  No

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

Yes No

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

Yes No

19. Are your *clients* solicited to invest in the *private fund*?

*NOTE: For purposes of this question, do not consider feeder funds of the private fund.*

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### Private Offering

Yes No

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

No Information Filed

#### B. SERVICE PROVIDERS

##### Auditors

Yes No

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

Yes  No  Report Not Yet Received

*If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.*

##### Prime Broker

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

##### Custodian

Yes No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

##### **Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian: STATE STREET BANK AND TRUST COMPANY			
(c) Primary business name of custodian: STATE STREET BANK AND TRUST COMPANY			
(d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country):			
City: BOSTON	State: Massachusetts	Country: United States	Yes <input type="radio"/> No <input checked="" type="radio"/>
(e) Is the custodian a <i>related person</i> of your firm?			
(f) If the custodian is a broker-dealer, provide its SEC registration number (if any): - CRD Number (if any):			
(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>legal entity identifier</i> (if any) 571474TGEMMWANRLN572			

#### Administrator

26. (a) Does the <i>private fund</i> use an administrator other than your firm? If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.	Yes <input type="radio"/> No <input checked="" type="radio"/>	
<b>Additional Administrator Information : 1 Record(s) Filed.</b>		
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.		
(b) Name of administrator: STATE STREET BANK AND TRUST COMPANY		
(c) Location of administrator (city, state and country): City: BOSTON	State: Massachusetts	Country: United States
(d) Is the administrator a <i>related person</i> of your firm? Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input type="radio"/> No <input checked="" type="radio"/>	
(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors? Yes <input checked="" type="radio"/> Some <input type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> Some <input type="radio"/> No <input type="radio"/>	
(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) <i>private fund's</i> investors? If investor account statements are not sent to the (rest of the) <i>private fund's</i> investors, respond "not applicable."		

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

#### Marketers

28. (a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.	Yes <input type="radio"/> No <input checked="" type="radio"/>
---	---

## A. PRIVATE FUND

**Information About the Private Fund**1. (a) Name of the *private fund*:

HIMCO MONEY MARKET DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-8160831744

2. Under the laws of what state or country is the *private fund* organized:

State:

Connecticut

Country:

United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

**Yes No**

## 6. (a) Is this a "master fund" in a master-feeder arrangement?

 (b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

**Yes No**

## (c) Is this a "feeder fund" in a master-feeder arrangement?

 (d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?Name of *private fund*:*Private fund* identification number:

(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

## 7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

**Yes No**8. (a) Is this *private fund* a "fund of funds"? 

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

<p>(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i>?</p> <p style="text-align: right;">Yes No</p> <p>9. During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?</p> <p style="text-align: right;">Yes No</p> <p>10. What type of fund is the <i>private fund</i>?</p> <p><input checked="" type="radio"/> hedge fund <input type="radio"/> liquidity fund <input type="radio"/> private equity fund <input type="radio"/> real estate fund <input type="radio"/> securitized asset fund <input type="radio"/> venture capital fund <input checked="" type="radio"/> Other <i>private fund</i>:</p> <p>NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.</p> <p>11. Current gross asset value of the <i>private fund</i>:</p> <p>\$ 509,310,943</p> <p><b><u>Ownership</u></b></p> <p>12. Minimum investment commitment required of an investor in the <i>private fund</i>:</p> <p>\$ 0</p> <p>NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).</p> <p>13. Approximate number of the <i>private fund's</i> beneficial owners:</p> <p>1</p> <p>14. What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i>:</p> <p>0%</p> <p>15. (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:</p> <p>0%</p> <p style="text-align: right;">Yes No</p> <p>(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i>?</p> <p style="text-align: right;">Yes No</p> <p>16. What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>:</p> <p>0%</p> <p><b><u>Your Advisory Services</u></b></p> <p style="text-align: right;">Yes No</p> <p>17. (a) Are you a subadviser to this <i>private fund</i>?</p> <p style="text-align: right;">Yes No</p> <p>(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i>. If the answer to question 17.(a) is "no," leave this question blank.</p> <div style="border: 1px solid black; padding: 5px; text-align: center;">No Information Filed</div> <p style="text-align: right;">Yes No</p> <p>18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i>?</p> <p style="text-align: right;">Yes No</p> <p>(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i>. If the answer to question 18.(a) is "no," leave this question blank.</p> <div style="border: 1px solid black; padding: 5px; text-align: center;">No Information Filed</div> <p style="text-align: right;">Yes No</p> <p>19. Are your <i>clients</i> solicited to invest in the <i>private fund</i>?</p> <p>NOTE: For purposes of this question, do not consider feeder funds of the <i>private fund</i>.</p> <p style="text-align: right;">Yes No</p> <p>20. Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i>?</p> <p>1%</p> <p><b><u>Private Offering</u></b></p> <p style="text-align: right;">Yes No</p> <p>21. Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?</p> <p style="text-align: right;">Yes No</p> <p>22. If yes, provide the <i>private fund's</i> Form D file number (if any):</p> <div style="border: 1px solid black; padding: 5px; width: 100%;">Form D file number 021-61409</div>
--

B. SERVICE PROVIDERS

Auditors

Yes No

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

Yes  No  Report Not Yet Received

*If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.*

Prime Broker

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

Custodian

Yes No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

**Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:

STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:

STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

Yes No

(e) Is the custodian a *related person* of your firm?

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):

-

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

571474TGEMMWANRLN572

Administrator

Yes No

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

**Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:

STATE STREET BANK AND TRUST COMPANY

(c) Location of administrator (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

**Yes No**

(d) Is the administrator a *related person* of your firm?

(e) Does the administrator prepare and send investor account statements to the *private fund's* investors?

Yes (provided to all investors)  Some (provided to some but not all investors)  No (provided to no investors)

(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

**Marketers**

**Yes No**

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

**A. PRIVATE FUND**

**Information About the Private Fund**

1. (a) Name of the *private fund*:

HIMCO MSCI EAFE INDEX DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-6931935696

2. Under the laws of what state or country is the *private fund* organized:

State:  
Connecticut

Country:  
United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

Yes No

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

Yes No

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

*Private fund* identification number:

(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

Yes No

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 153,260,721

#### **Ownership**

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes No

(b) If the *private fund* qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

#### **Your Advisory Services**

Yes No

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

Yes No

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

Yes No

19. Are your *clients* solicited to invest in the *private fund*?

*NOTE: For purposes of this question, do not consider feeder funds of the private fund.*

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### **Private Offering**

Yes No

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

No Information Filed

#### **B. SERVICE PROVIDERS**

##### **Auditors**

Yes No

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?  Yes  No  Report Not Yet Received

*If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.*

##### **Prime Broker**

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

**Custodian**25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets? Yes  No

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

**Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:

STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:

STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):City:  
BOSTONState:  
MassachusettsCountry:  
United States Yes  No(e) Is the custodian a *related person* of your firm? Yes  No

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):

-

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

571474TGEMMWANRLN572

**Administrator**26. (a) Does the *private fund* use an administrator other than your firm? Yes  No

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

**Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:

STATE STREET BANK AND TRUST COMPANY

(c) Location of administrator (city, state and country):

City:  
BOSTONState:  
MassachusettsCountry:  
United States Yes  No(d) Is the administrator a *related person* of your firm? Yes  No(e) Does the administrator prepare and send investor account statements to the *private fund's* investors? Yes (provided to all investors)  Some (provided to some but not all investors)  No (provided to no investors)(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

**Marketers**

**Yes No**

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

**A. PRIVATE FUND**

**Information About the Private Fund**

1. (a) Name of the *private fund*:

HIMCO S&P 500 INDEX DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:  
(include the "805-" prefix also)

805-8540898343

2. Under the laws of what state or country is the *private fund* organized:

State:  
Connecticut

Country:  
United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

**Yes No**

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

**Yes No**

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

*Private fund* identification number:  
(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

Yes No

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 3,090,513,395

#### Ownership

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes No

(b) If the *private fund* qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States* persons:

0%

#### Your Advisory Services

Yes No

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

Yes No

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

19. Are your *clients* solicited to invest in the *private fund*?

Yes No

*NOTE: For purposes of this question, do not consider feeder funds of the private fund.*

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### Private Offering

Yes No

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

No Information Filed

### B. SERVICE PROVIDERS

#### Auditors

Yes No

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

Yes  No  Report Not Yet Received

*If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.*

#### Prime Broker

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

#### Custodian

Yes No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

#### **Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:

STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:

STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

(e) Is the custodian a *related person* of your firm? Yes No

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):  
-  
CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

571474TGEMMWANRLN572

#### Administrator

Yes No

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

#### **Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:

STATE STREET BANK AND TRUST COMPANY

(c) Location of administrator (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

Yes No

(d) Is the administrator a *related person* of your firm?

(e) Does the administrator prepare and send investor account statements to the *private fund's* investors?

Yes (provided to all investors)  Some (provided to some but not all investors)  No (provided to no investors)

(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

#### Marketers

Yes No

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

#### A. PRIVATE FUND

##### Information About the Private Fund

1. (a) Name of the *private fund*:

HIMCO SOFR ENHANCED DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:  
(include the "805-" prefix also)  
805-6583655917

2. Under the laws of what state or country is the *private fund* organized:

State: Connecticut  
Country: United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

<b>Name of General Partner, Manager, Trustee, or Director</b>
TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

Yes No

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

Yes No

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

*Private fund* identification number:  
(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

Yes No

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 19,391,919

#### **Ownership**

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

**Yes** **No**

(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

#### **Your Advisory Services**

**Yes** **No**

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

**Yes** **No**

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

**Yes** **No**

19. Are your *clients* solicited to invest in the *private fund*?

NOTE: For purposes of this question, do not consider *feeder funds* of the *private fund*.

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### **Private Offering**

**Yes** **No**

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

**Form D file number**

021-128910

#### **B. SERVICE PROVIDERS**

#### **Auditors**

**Yes** **No**

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

Yes  No  Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

#### Prime Broker

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

#### Custodian

Yes No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

#### **Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:  
STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:  
STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):  
City: BOSTON State: Massachusetts Country: United States

(e) Is the custodian a *related person* of your firm?

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):  
-

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)  
571474TGEMMWANRLN572

Yes No

#### Administrator

Yes No

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

#### **Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:	STATE STREET BANK AND TRUST COMPANY		
(c) Location of administrator (city, state and country):	City: BOSTON	State: Massachusetts	Country: United States
(d) Is the administrator a <i>related person</i> of your firm?	<input type="radio"/> Yes <input checked="" type="radio"/> No		
(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?	<input checked="" type="radio"/> Yes (provided to all investors) <input type="radio"/> Some (provided to some but not all investors) <input type="radio"/> No (provided to no investors)		
(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) <i>private fund's</i> investors? If investor account statements are not sent to the (rest of the) <i>private fund's</i> investors, respond "not applicable."			

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

#### **Marketers**

**Yes No**

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

#### **A. PRIVATE FUND**

##### **Information About the Private Fund**

1. (a) Name of the *private fund*:

HIMCO SOFR ENHANCED LIQUIDITY DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-9739680828

2. Under the laws of what state or country is the *private fund* organized:

State:  
Connecticut

Country:  
United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filings adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

**Yes No**

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

Yes No

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

*Private fund* identification number:

(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

Yes No

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 429,206,336

#### **Ownership**

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes No

(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States* persons:

0%

#### Your Advisory Services

Yes No

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?

Yes No

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

19. Are your *clients* solicited to invest in the *private fund*?

Yes No

*NOTE: For purposes of this question, do not consider feeder funds of the private fund.*

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### Private Offering

Yes No

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

No Information Filed

### B. SERVICE PROVIDERS

#### Auditors

Yes No

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

Yes  No  Report Not Yet Received

*If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.*

#### Prime Broker

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

#### Custodian

Yes No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

**Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:  
STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:  
STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):

City: BOSTON	State: Massachusetts	Country: United States
-----------------	-------------------------	---------------------------

Yes No

(e) Is the custodian a *related person* of your firm?

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):

-

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

571474TGEMMWANRLN572

**Administrator**

Yes No

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

**Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:  
STATE STREET BANK AND TRUST COMPANY

(c) Location of administrator (city, state and country):

City: BOSTON	State: Massachusetts	Country: United States
-----------------	-------------------------	---------------------------

Yes No

(d) Is the administrator a *related person* of your firm?

(e) Does the administrator prepare and send investor account statements to the *private fund's* investors?

Yes (provided to all investors)  Some (provided to some but not all investors)  No (provided to no investors)

(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

**Marketers**

Yes No

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

A. PRIVATE FUND

**Information About the Private Fund**

1. (a) Name of the *private fund*:

HIMCO U.S. AGGREGATE BOND INDEX DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-1137026333

2. Under the laws of what state or country is the *private fund* organized:

State:  
Connecticut

Country:  
United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

Yes No

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

Yes No

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

*Private fund* identification number:  
(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

8. (a) Is this *private fund* a "fund of funds"? Yes No

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*? Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? Yes No

10. What type of fund is the *private fund*? Yes No

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 3,446,255,677

#### **Ownership**

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes No

(b) If the *private fund* qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*? Yes No

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

#### **Your Advisory Services**

17. (a) Are you a subadviser to this *private fund*? Yes No

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

Yes No

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*? Yes No

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

Yes No

19. Are your *clients* solicited to invest in the *private fund*? Yes No

NOTE: For purposes of this question, do not consider *feeder funds* of the *private fund*.

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### **Private Offering**

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? Yes No

22. If yes, provide the *private fund's* Form D file number (if any):

No Information Filed

B. SERVICE PROVIDERS

**Auditors**

Yes No

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

Yes  No  Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

**Prime Broker**

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

**Custodian**

Yes No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

**Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:

STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:

STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

Yes No

(e) Is the custodian a *related person* of your firm?

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):

-

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

**Administrator**26. (a) Does the *private fund* use an administrator other than your firm? Yes  No

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

**Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:

STATE STREET BANK AND TRUST COMPANY

(c) Location of administrator (city, state and country):

City:  
BOSTONState:  
MassachusettsCountry:  
United States Yes  No(d) Is the administrator a *related person* of your firm? Yes  No(e) Does the administrator prepare and send investor account statements to the *private fund's* investors? Yes (provided to all investors)  Some (provided to some but not all investors)  No (provided to no investors)(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

**Marketers** Yes  No28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes? Yes  No

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

**A. PRIVATE FUND****Information About the Private Fund**1. (a) Name of the *private fund*:

SV HIMCO ACTIVE COMMERCIAL MORTGAGE-BACKED SECURITY DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-8357680708

2. Under the laws of what state or country is the *private fund* organized:

State: Connecticut Country: United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

**Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

Yes No

6. (a) Is this a "master fund" in a master-feeder arrangement?

 (b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

Yes No

(c) Is this a "feeder fund" in a master-feeder arrangement?

 (d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?Name of *private fund*:*Private fund* identification number:

(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

Yes No

8. (a) Is this *private fund* a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*? 

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? 10. What type of fund is the *private fund*?

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 933,093,122

**Ownership**12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes No

(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

Yes No

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

Yes No

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

Yes No

19. Are your *clients* solicited to invest in the *private fund*?

NOTE: For purposes of this question, do not consider feeder funds of the *private fund*.

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### Private Offering

Yes No

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

Form D file number

021-78261

#### B. SERVICE PROVIDERS

##### Auditors

Yes No

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit?

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

Yes  No  Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

**Prime Broker****Yes No**

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

**Custodian****Yes No**

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

**Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:

STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian:

STATE STREET BANK AND TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

**Yes No**

(e) Is the custodian a *related person* of your firm?

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):

-

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

571474TGEMMWANRLN572

**Administrator****Yes No**

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

**Additional Administrator Information : 1 Record(s) Filed.**

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

(b) Name of administrator:

STATE STREET BANK AND TRUST COMPANY

(c) Location of administrator (city, state and country):

City:  
BOSTON

State:  
Massachusetts

Country:  
United States

**Yes No**

(d) Is the administrator a *related person* of your firm?

(e) Does the administrator prepare and send investor account statements to the *private fund's* investors?

Yes (provided to all investors)  Some (provided to some but not all investors)  No (provided to no investors)

(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

#### **Marketers**

**Yes No**

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

#### **A. PRIVATE FUND**

##### **Information About the Private Fund**

1. (a) Name of the *private fund*:

SVA HIMCO U.S. AGGREGATE BOND INDEX DIVISION, A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INSURANCE COMPANY

(b) *Private fund* identification number:  
(include the "805-" prefix also)

805-7140362685

2. Under the laws of what state or country is the *private fund* organized:

State:  
Connecticut

Country:  
United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

##### **Name of General Partner, Manager, Trustee, or Director**

TALCOTT RESOLUTION LIFE INS CO IS THE OWNER OF THE SEPARATE ACCOUNT WHICH WAS ESTABLISHED UNDER CONNECTICUT INSURANCE LAW

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  
 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

**Yes No**

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

**Yes No**

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

Private fund identification number:  
(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

	Yes	No
8. (a) Is this <i>private fund</i> a "fund of funds"?	<input type="radio"/>	<input checked="" type="radio"/>
NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.		
(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
9. During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	<input type="radio"/>	<input checked="" type="radio"/>
10. What type of fund is the <i>private fund</i> ?		

hedge fund  liquidity fund  private equity fund  real estate fund  securitized asset fund  venture capital fund  Other *private fund*: A SEPARATE ACCOUNT OF TALCOTT RESOLUTION LIFE INS CO

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 1,729,047,895

#### Ownership

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

1

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes   No

(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

#### Your Advisory Services

Yes   No

17. (a) Are you a subadviser to this *private fund*?

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*? Yes  No

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

19. Are your *clients* solicited to invest in the *private fund*? Yes  No

*NOTE: For purposes of this question, do not consider feeder funds of the private fund.*

20. Approximately what percentage of your *clients* has invested in the *private fund*?

1%

#### Private Offering

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? Yes  No

22. If yes, provide the *private fund's* Form D file number (if any):

No Information Filed

#### B. SERVICE PROVIDERS

##### Auditors

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit? Yes  No

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? Yes  No

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information Filed

Yes  No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors? Yes  No

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions? Yes  No

Yes  No  Report Not Yet Received

*If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.*

##### Prime Broker

24. (a) Does the *private fund* use one or more prime brokers? Yes  No

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

Yes  No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets? Yes  No

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

##### **Additional Custodian Information : 1 Record(s) Filed.**

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:  
STATE STREET BANK AND TRUST COMPANY

(c) Primary business name of custodian: STATE STREET BANK AND TRUST COMPANY			
(d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country):			
City: BOSTON	State: Massachusetts	Country: United States	Yes No <input type="radio"/> <input checked="" type="radio"/>
(e) Is the custodian a <i>related person</i> of your firm?			
(f) If the custodian is a broker-dealer, provide its SEC registration number (if any): - CRD Number (if any):			
(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>legal entity identifier</i> (if any) 571474TGEMMWANRLN572			

#### **Administrator**

26. (a) Does the <i>private fund</i> use an administrator other than your firm? If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.	Yes No <input type="radio"/> <input checked="" type="radio"/>	
<b>Additional Administrator Information : 1 Record(s) Filed.</b>		
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.		
(b) Name of administrator: STATE STREET BANK AND TRUST COMPANY		
(c) Location of administrator (city, state and country):		
City: BOSTON	State: Massachusetts	Country: United States
Yes No <input type="radio"/> <input checked="" type="radio"/>	(d) Is the administrator a <i>related person</i> of your firm?	
(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors? <input checked="" type="radio"/> Yes (provided to all investors) <input type="radio"/> Some (provided to some but not all investors) <input type="radio"/> No (provided to no investors)		
(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) <i>private fund's</i> investors? If investor account statements are not sent to the (rest of the) <i>private fund's</i> investors, respond "not applicable."		

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

#### **Marketers**

28. (a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.	Yes No <input type="radio"/> <input checked="" type="radio"/>
No Information Filed	

**SECTION 7.B.(2) *Private Fund Reporting***

No Information Filed

**Item 8 Participation or Interest in Client Transactions**

In this Item, we request information about your participation and interest in your *clients'* transactions. This information identifies additional areas in which conflicts of interest may occur between you and your *clients*. Newly-formed advisers should base responses to these questions on the types of participation and interest that you expect to engage in during the next year.

Like Item 7, Item 8 requires you to provide information about you and your *related persons*, including foreign affiliates.

**Proprietary Interest in Client Transactions**

A. Do you or any <i>related person</i> :	<b>Yes</b> <input type="radio"/> <b>No</b> <input type="radio"/>
(1) buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?	<input type="radio"/> <input checked="" type="radio"/>
(2) buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?	<input type="radio"/> <input checked="" type="radio"/>
(3) recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	<input type="radio"/> <input checked="" type="radio"/>

**Sales Interest in Client Transactions**

B. Do you or any <i>related person</i> :	<b>Yes</b> <input type="radio"/> <b>No</b> <input type="radio"/>
(1) as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	<input type="radio"/> <input checked="" type="radio"/>
(2) recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	<input type="radio"/> <input checked="" type="radio"/>
(3) recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	<input type="radio"/> <input checked="" type="radio"/>

**Investment or Brokerage Discretion**

C. Do you or any <i>related person</i> have <i>discretionary authority</i> to determine the:	<b>Yes</b> <input type="radio"/> <b>No</b> <input type="radio"/>
(1) securities to be bought or sold for a <i>client's</i> account?	<input type="radio"/> <input checked="" type="radio"/>
(2) amount of securities to be bought or sold for a <i>client's</i> account?	<input type="radio"/> <input checked="" type="radio"/>
(3) broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?	<input type="radio"/> <input checked="" type="radio"/>
(4) commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	<input type="radio"/> <input checked="" type="radio"/>
D. If you answer "yes" to C.(3) above, are any of the brokers or dealers <i>related persons</i> ?	<input type="radio"/> <input checked="" type="radio"/>
E. Do you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ?	<input type="radio"/> <input checked="" type="radio"/>
F. If you answer "yes" to E. above, are any of the brokers or dealers <i>related persons</i> ?	<input type="radio"/> <input checked="" type="radio"/>
G. (1) Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	<input type="radio"/> <input checked="" type="radio"/>
(2) If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	<input type="radio"/> <input checked="" type="radio"/>
H. (1) Do you or any <i>related person</i> , directly or indirectly, compensate any <i>person</i> that is not an <i>employee</i> for <i>client</i> referrals?	<input type="radio"/> <input checked="" type="radio"/>
(2) Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)?	<input type="radio"/> <input checked="" type="radio"/>
I. Do you or any <i>related person</i> , including any <i>employee</i> , directly or indirectly, receive compensation from any <i>person</i> (other than you or any <i>related person</i> ) for <i>client</i> referrals?	<input type="radio"/> <input checked="" type="radio"/>

*In your response to Item 8.I., do not include the regular salary you pay to an employee.*

*In responding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or received from (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.*

**Item 9 Custody**

In this Item, we ask you whether you or a *related person* has *custody* of *client* (other than *clients* that are investment companies registered under the Investment Company Act of 1940) assets and about your custodial practices.

A. (1) Do you have <i>custody</i> of any <i>advisory clients</i> ?	<b>Yes</b> <input type="radio"/> <b>No</b> <input checked="" type="radio"/>
(a) cash or bank accounts?	<input type="radio"/> <input checked="" type="radio"/>
(b) securities?	<input type="radio"/> <input checked="" type="radio"/>

*If you are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your clients' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.*

(2) If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which you have *custody*:

U.S. Dollar Amount	Total Number of Clients
(a) \$	(b)

*If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2).*

B. (1) In connection with advisory services you provide to <i>clients</i> , do any of your <i>related persons</i> have <i>custody</i> of any of your <i>advisory clients</i> ?	<b>Yes</b> <input type="radio"/> <b>No</b> <input checked="" type="radio"/>
(a) cash or bank accounts?	<input type="radio"/> <input checked="" type="radio"/>
(b) securities?	<input type="radio"/> <input checked="" type="radio"/>

*You are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b).*

(2) If you checked "yes" to Item 9.B.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which your *related persons* have *custody*:

U.S. Dollar Amount	Total Number of Clients
(a) \$	(b)

C. If you or your *related persons* have *custody* of *client* funds or securities in connection with advisory services you provide to *clients*, check all the following that apply:

(1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage.	<input type="checkbox"/>
(2) An <i>independent public accountant</i> audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools.	<input type="checkbox"/>
(3) An <i>independent public accountant</i> conducts an annual surprise examination of <i>client</i> funds and securities.	<input type="checkbox"/>
(4) An <i>independent public accountant</i> prepares an internal control report with respect to custodial services when you or your <i>related persons</i> are qualified custodians for <i>client</i> funds and securities.	<input type="checkbox"/>

*If you checked Item 9.C.(2), C.(3) or C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the private funds you advise in Section 7.B.(1) of Schedule D).*

D. Do you or your <i>related person</i> (s) act as qualified custodians for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	<b>Yes</b> <input type="radio"/> <b>No</b> <input checked="" type="radio"/>
(1) you act as a qualified custodian	<input type="radio"/> <input checked="" type="radio"/>
(2) your <i>related person</i> (s) act as qualified custodian(s)	<input type="radio"/> <input checked="" type="radio"/>

*If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.*

E. If you are filing your *annual updating amendment* and you were subject to a surprise examination by an *independent public accountant* during your last fiscal year, provide the date (MM/YYYY) the examination commenced:

F. If you or your *related persons* have *custody* of *client* funds or securities, how many *persons*, including, but not limited to, you and your *related persons*, act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?

**SECTION 9.C. Independent Public Accountant**

No Information Filed



**Item 10 Control Persons**

In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you. If you are filing an *umbrella registration*, the information in Item 10 should be provided for the *filing adviser* only.

If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.

Yes No

A. Does any *person* not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, *control* your management or policies?

*If yes, complete Section 10.A. of Schedule D.*

B. If any *person* named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please complete Section 10.B. of Schedule D.

**SECTION 10.A. Control Persons**

No Information Filed

**SECTION 10.B. Control Person Public Reporting Companies**

B. If any *person* named in Schedules A, B, or C, or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please provide the following information (you must complete a separate Schedule D Section 10.B. for each public reporting company):

(1) Full legal name of the public reporting company: THE HARTFORD INSURANCE GROUP, INC.  
(2) The public reporting company's CIK number (Central Index Key number that the SEC assigns to each reporting company): 874766

**Item 11 Disclosure Information**

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your *advisory affiliates*. We use this information to determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the *filings adviser* and all *relying advisers* under an *umbrella registration*.

Your *advisory affiliates* are: (1) all of your current *employees* (other than *employees* performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any *person* performing similar functions); and (3) all *persons* directly or indirectly *controlling* you or *controlled* by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your *advisory affiliates* are.

*If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.*

You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.

	Yes	No
Do any of the events below involve you or any of your <i>supervised persons</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
<u>For "yes" answers to the following questions, complete a Criminal Action DRP:</u>		
A. In the past ten years, have you or any <i>advisory affiliate</i> :	Yes	No
(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any <i>felony</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(2) been <i>charged</i> with any <i>felony</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
<i>If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are currently pending.</i>		
B. In the past ten years, have you or any <i>advisory affiliate</i> :	Yes	No
(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	<input type="radio"/>	<input checked="" type="radio"/>
(2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)?	<input type="radio"/>	<input checked="" type="radio"/>
<i>If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are currently pending.</i>		
<u>For "yes" answers to the following questions, complete a Regulatory Action DRP:</u>		
C. Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	No
(1) <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission?	<input type="radio"/>	<input checked="" type="radio"/>
(2) <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of SEC or CFTC regulations or statutes?	<input type="radio"/>	<input checked="" type="radio"/>
(3) <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	<input type="radio"/>	<input checked="" type="radio"/>
(4) entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with <i>investment-related</i> activity?	<input type="radio"/>	<input checked="" type="radio"/>
(5) imposed a civil money penalty on you or any <i>advisory affiliate</i> , or <i>ordered</i> you or any <i>advisory affiliate</i> to cease and desist from any activity?	<input type="radio"/>	<input checked="" type="radio"/>
D. Has any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> :	Yes	No
(1) ever <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission, or been dishonest, unfair, or unethical?	<input type="radio"/>	<input checked="" type="radio"/>
(2) ever <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of <i>investment-related</i> regulations or statutes?	<input type="radio"/>	<input checked="" type="radio"/>
(3) ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	<input type="radio"/>	<input checked="" type="radio"/>
(4) in the past ten years, entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with an <i>investment-related</i> activity?	<input type="radio"/>	<input checked="" type="radio"/>
(5) ever denied, suspended, or revoked your or any <i>advisory affiliate</i> 's registration or license, or otherwise prevented you or any <i>advisory affiliate</i> , by <i>order</i> , from associating with an <i>investment-related</i> business or restricted your or any <i>advisory affiliate</i> 's activity?	<input type="radio"/>	<input checked="" type="radio"/>
E. Has any <i>self-regulatory organization</i> or commodities exchange ever:	Yes	No
(1) <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission?	<input type="radio"/>	<input checked="" type="radio"/>
(2) <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	<input type="radio"/>	<input checked="" type="radio"/>
(3) <i>found</i> you or any <i>advisory affiliate</i> to have been the cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	<input type="radio"/>	<input checked="" type="radio"/>
(4) disciplined you or any <i>advisory affiliate</i> by expelling or suspending you or the <i>advisory affiliate</i> from membership, barring or suspending you or the <i>advisory affiliate</i> from association with other members, or otherwise restricting your or the <i>advisory affiliate</i> 's activities?	<input type="radio"/>	<input checked="" type="radio"/>
F. Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any <i>advisory affiliate</i> ever been revoked or suspended?	<input type="radio"/>	<input checked="" type="radio"/>

G. Are you or any *advisory affiliate* now the subject of any regulatory *proceeding* that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?

For "yes" answers to the following questions, complete a Civil Judicial Action DRP:

	Yes	No
H. (1) Has any domestic or foreign court:	<input type="radio"/>	<input checked="" type="radio"/>
(a) in the past ten years, <i>enjoined</i> you or any <i>advisory affiliate</i> in connection with any <i>investment-related</i> activity?	<input type="radio"/>	<input checked="" type="radio"/>
(b) ever <i>found</i> that you or any <i>advisory affiliate</i> were <i>involved</i> in a violation of <i>investment-related</i> statutes or regulations?	<input type="radio"/>	<input checked="" type="radio"/>
(c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any <i>advisory affiliate</i> by a state or <i>foreign financial regulatory authority</i> ?	<input type="radio"/>	<input checked="" type="radio"/>
(2) Are you or any <i>advisory affiliate</i> now the subject of any civil <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.H.(1)?	<input type="radio"/>	<input checked="" type="radio"/>

**Item 12 Small Businesses**

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC **and** you indicated in response to Item 5.F.(2)(c) that you have regulatory assets under management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

For purposes of this Item 12 only:

- Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person*'s total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).
- *Control* means the power to direct or cause the direction of the management or policies of a *person*, whether through ownership of securities, by contract, or otherwise. Any *person* that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or more of the profits, of another *person* is presumed to *control* the other *person*.

	Yes	No
A. Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	<input type="radio"/>	<input checked="" type="radio"/>
<i>If "yes," you do not need to answer Items 12.B. and 12.C.</i>		
B. Do you:		
(1) <i>control</i> another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	<input type="radio"/>	<input checked="" type="radio"/>
(2) <i>control</i> another <i>person</i> (other than a natural <i>person</i> ) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	<input type="radio"/>	<input checked="" type="radio"/>
C. Are you:		
(1) <i>controlled</i> by or under common <i>control</i> with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	<input type="radio"/>	<input checked="" type="radio"/>
(2) <i>controlled</i> by or under common <i>control</i> with another <i>person</i> (other than a natural <i>person</i> ) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	<input type="radio"/>	<input checked="" type="radio"/>

**Schedule A****Direct Owners and Executive Officers**

1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
2. Direct Owners and Executive Officers. List below the names of:
  - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer(Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
  - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);

Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.

  - (c) if you are organized as a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
  - (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
  - (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
3. Do you have any indirect owners to be reported on Schedule B?  Yes  No
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are:
 

NA - less than 5%	B - 10% but less than 25%	D - 50% but less than 75%
A - 5% but less than 10%	C - 25% but less than 50%	E - 75% or more
7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
- (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
- (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Title or Status	Date Title or Status Acquired MM/YYYY	Ownership Code	Control Person	PR	CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
THE HARTFORD INSURANCE GROUP, INC.	DE	PARENT OF APPLICANT	12/1996	E	Y	Y	13-3317783
PAGE, BRENDA, JEAN	I	SECRETARY AND CHIEF LEGAL OFFICER	08/2007	NA	Y	N	5409887
MAHER, JOHN, M	I	EXECUTIVE MANAGING DIRECTOR AND DIRECTOR	08/2015	NA	Y	N	6556031
BRENNAN, TIMOTHY, L.	I	CHIEF COMPLIANCE OFFICER	07/2017	NA	Y	N	6827038
STEPNOWSKI, AMY, MARIE	I	PRESIDENT AND DIRECTOR	08/2020	NA	Y	N	2740100
PERROTTI, PETER, P.	I	EXECUTIVE MANAGING DIRECTOR AND DIRECTOR	12/2022	NA	Y	N	7284779
EDELBLUM, IRA	I	SENIOR MANAGING DIRECTOR AND DIRECTOR	03/2021	NA	Y	N	2120088
AUBE, RENE	I	SENIOR MANAGING DIRECTOR AND DIRECTOR	01/2022	NA	Y	N	7489667
PASCAVIS, TRAVIS, SCOTT	I	SENIOR MANAGING DIRECTOR AND DIRECTOR	08/2024	NA	Y	N	4732743
NORMAN, HARRY, PATRICK	I	CHIEF RISK OFFICER	11/2024	NA	Y	N	8006705
MATTHEWS, KATHLEEN, M	I	CHIEF FINANCIAL OFFICER	04/2025	NA	Y	N	8057607

**Schedule B**

## Indirect Owners

1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
  - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

For purposes of this Schedule, a person beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
  - (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
  - (c) in the case of an owner that is a trust, the trust and each trustee; and
  - (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are: C - 25% but less than 50% E - 75% or more  
D - 50% but less than 75% F - Other (general partner, trustee, or elected manager)
7. (a) In the *Control Person* column, enter "Yes" if the *person has control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person does not have control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.  
(b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.  
(c) Complete each column.

No Information Filed

**Schedule D - Miscellaneous**

You may use the space below to explain a response to an Item or to provide any other information.

Item 1.F.(2): Hartford Investment Management Company ("HIMCO") is currently operating under a hybrid model whereby employees are generally in the office Tuesday through Thursday and engage in remote work on Monday and Friday. However, the office is open all five days and employees can come in any weekday at their discretion. Items 5.C.(1) and 5.(D): A drop in HIMCO's investment company clients (from 49 to 25) and other pooled investment vehicle clients (from 36 to 13) caused the majority of the drop in total client count from last year's annual filing to this filing. However, this decrease was not due to HIMCO actually being terminated by any of its investment company or pooled investment vehicle clients. The decrease was caused by: (1) twenty-four (24) of the unit investment trusts ("UITs") for which HIMCO served as portfolio consultant hitting their maturity date during 2024; and (2) HIMCO revising how it counts and reports the COLI private funds, which are portfolios owned by unaffiliated insurance company separate accounts that meet the definition of private fund. HIMCO is now counting its COLI private funds at the Division (or portfolio) level as that is how HIMCO manages each fund. Item 5.D: HIMCO generally counts its clients by legal entity. However, there are exceptions to this general practice. HIMCO manages two separate categories of assets for one of its insurance company clients: (a) insurance general and separate account assets; and (b) assets in certain separate accounts that rely on exemptions to registration under the Investment Company Act of 1940. HIMCO counts clients with respect to these categories of assets as follows: (i) HIMCO counts the insurance company client as one client for purposes of management of the assets described in (a) above; and (ii) because HIMCO has historically included the assets in category (b) above as private funds in HIMCO's Form ADV and Form PF filings (out of an abundance of caution), it counts each private fund separately. There are thirteen (13) of these private funds disclosed in response to Item 7.B and thus HIMCO has listed thirteen (13) clients in response to Item 5.D.(f). HIMCO also counts various affiliated pension and employee benefit plans as separate clients from the affiliates that sponsor them (such affiliates are also HIMCO clients). Due to a SEC Form ADV FAQ concerning Items 5.C.(1) and 5.D (published in October 2023), HIMCO now also includes the twenty-four (24) unit investment trusts for which it serves as portfolio consultant. HIMCO has since made the decision to exit this business but continues to provide support for certain trusts that launched prior to February 29, 2024. Finally, one of HIMCO's clients is a Bermuda segregated accounts company with multiple segregated accounts, each containing assets held exclusively for the benefit of its distinct segregated account owner. HIMCO counts each of the segregated accounts as a client (seven (7) in total). Item 5.E.(7): HIMCO is reimbursed for costs incurred for providing investment services to its affiliates. Schedule D Section 5.K.(2): Please note that in certain instances the derivative exposure percentages provided in the charts appear unusually high. This is largely the result of the following factors: 1. HIMCO has applied the concept of "separately managed account" at the portfolio level (instead of the legal entity level). Numerous HIMCO clients have multiple portfolios that all belong to the same legal entity and HIMCO generally manages derivatives at the legal entity level (with some portfolios holding more derivatives than others). Thus when calculating gross notional exposure according to the calculation required by the form, the denominator is the portfolio's regulatory assets under management (not the legal entity's). Accordingly, the denominator for the calculation is lower than it would be if HIMCO applied the concept of separately managed account at the legal entity level. Had HIMCO applied the concept of separately managed account at the legal entity level, the percentages would have been lower. 2. Per the instructions to Form ADV, gross notional exposure must be calculated using the gross notional value of the derivatives. The instructions do not explicitly permit netting of offsetting derivative contracts, which would reduce or in some cases eliminate the exposure caused by the derivatives in question. HIMCO did not net offsetting derivative contracts when calculating gross notional exposure. Thus, for clients that have offsetting derivative positions, the percentages do not reflect net exposure related to the derivatives. 3. Many of the clients for whom HIMCO transacts in derivatives pursue strategies that involve hedging risk. The largest gross notional exposures are in portfolios that are hedging focused. Item 5.L.(1)(e) and 5.L.(2): HIMCO responds "Yes" to Items 5.L.(1)(e) and 5.L.(2) (use of third-party ratings and payment of compensation in connection with third party ratings) due to the fact that HIMCO pays for access to the eVestment analytics service through which HIMCO is able to produce peer relative exhibits based on the manager/product data in the eVestments database, and utilized such exhibit(s) as part of advertisement(s) in 2024. Item 5.L.(3): During 2024, HIMCO utilized hypothetical performance in two advertisements, both at the sophisticated institutional client's request. Thus, HIMCO is responding "Yes" to Item 5.L.(3). Schedule D, Section 7.A: As an investment adviser that is part of a larger holding company, HIMCO has a number of related persons that are not included in Section 7.A of Schedule D because they do not fit into one of the sixteen (16) categories of entities listed in Item 7.A. HIMCO will provide a supplemental list of these related persons upon request. Item 7.B.(1) Q.28(a): HIMCO does not engage in marketing on behalf of the Separate Account ICMG Series private funds. General: The Hartford Insurance Group, Inc. ("HIG"), parent of HIMCO, and its subsidiaries are involved in legal actions, some of which assert claims for substantial amounts. Management expects that the ultimate liability, if any, with respect to such lawsuits, after consideration of provisions made for potential losses and costs of defense, will not be material to the consolidated financial condition, results of operations or cash flows of HIG. However, given the large or indeterminate amounts sought in certain of these actions, and the inherent unpredictability of litigation, the outcome in certain matters could, from time to time, have a material adverse effect on the company's results of operations or cash flows in particular quarterly or annual periods.

**Schedule R**

No Information Filed

**DRP Pages**

**CRIMINAL DISCLOSURE REPORTING PAGE (ADV)**

No Information Filed

**REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)**

No Information Filed

**CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)**

No Information Filed

**Part 2****Exemption from brochure delivery requirements for SEC-registered advisers**

SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering a brochure to *all* of your advisory clients, you do not have to prepare a brochure.

**Yes** **No**

Are you exempt from delivering a brochure to all of your clients under these rules?

*If no, complete the ADV Part 2 filing below.*

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
255736	HARTFORD INVESTMENT MANAGEMENT COMPANY FORM ADV PART 2A	Pension plans/profit sharing plans, Pension consulting, Other institutional, Private funds or pools, Selection of Other Advisers/Solicitors

**Part 3**

CRS	Type(s)	Affiliate Info	Retire
-----	---------	----------------	--------

There are no CRS filings to display.

**Execution Pages****DOMESTIC INVESTMENT ADVISER EXECUTION PAGE**

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

**1. Appointment of Agent for Service of Process**

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order instituting proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a *notice filing*.

**Signature**

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person having custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:

AMY M. STEPNOWSKI

Date: MM/DD/YYYY

03/27/2025

Printed Name:

AMY M. STEPNOWSKI

Title:

PRESIDENT

Adviser CRD Number:

106699

**NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE**

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

**1. Appointment of Agent for Service of Process**

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order instituting proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

**2. Appointment and Consent: Effect on Partnerships**

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

**3. Non-Resident Investment Adviser Undertaking Regarding Books and Records**

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

**Signature**

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person having custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:  
Printed Name:  
Adviser CRD Number:  
106699

Date: MM/DD/YYYY  
Title:

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

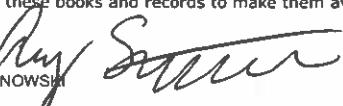
Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order instituting proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a *notice filing*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any person having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:   
AMY M. STEPNOWSKI

Date: 3/27/2025

Title:  
PRESIDENT

Adviser CRD Number:  
106699

**ITEM 1: COVER PAGE**

---

**Part 2A of Form ADV: Firm Brochure**

**HARTFORD INVESTMENT MANAGEMENT COMPANY  
("HIMCO")**

March 27, 2025

---

ONE HARTFORD PLAZA  
HARTFORD, CT 06155

SEC File Number 801-53542  
CRD Number 106699

Telephone Number: 860-297-6700  
Facsimile Number: 877-357-0645  
[HIMCOADV@himco.com](mailto:HIMCOADV@himco.com)

[www.himco.com](http://www.himco.com)  
[www.linkedin.com/company/hartford-investment-management/](http://www.linkedin.com/company/hartford-investment-management/)  
[www.facebook.com/Hartford-Investment-Management-Company-153262228023605](http://www.facebook.com/Hartford-Investment-Management-Company-153262228023605)

This brochure provides information about the qualifications and business practices of HIMCO. If you have any questions about the contents of this brochure, please contact us at 860-297-6700 or [HIMCOADV@himco.com](mailto:HIMCOADV@himco.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority.

Additional information about HIMCO also is available on the SEC's website at  
[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

## **ITEM 2: MATERIAL CHANGES**

The following is a summary of material changes made to this Brochure since the last annual update on March 28, 2024.

- Item 4.A was revised to reflect the name change of HIMCO's parent company from The Hartford Financial Services Group, Inc. to The Hartford Insurance Group, Inc. This name change became effective February 6, 2025.
- Items 4.A and 4.E were revised to update HIMCO's assets under management.
- Item 4.B was revised to include HIMCO's customizable insurance asset management capabilities.
- Items 4.B, 5.A, 7 and 8 were updated to add HIMCO's infrastructure and energy transition strategy to its principal strategies.
- Item 5.A was revised to expand upon the ways in which HIMCO is paid for its sub-advisory services to other registered investment advisers.
- Items 5.A and 5.B were revised to remove reference to receipt of initial fees for serving as portfolio consultant to unit investment trusts launched prior to February 29, 2024, as such fees are no longer required.
- Item 8 was revised to:
  - Update the public equity investment risks to add the risk of tax reclaims;
  - Remove reference to income generation as a typical use for derivatives; and
  - Add economic and trade sanctions related risks.
- Item 10.C was revised to remove reference to an affiliated broker/dealer as HIMCO no longer manages assets for this affiliate and thus its relationship is not considered material to HIMCO's advisory business or advisory clients. HIMCO does not trade through this affiliate.
- Item 10.D was updated to expand the potential conflicts of interest related to its sub-advisory relationships, as well as the controls in place to mitigate such conflicts.
- Item 11 was updated to expand upon outside business activity related conflicts of interest, including the addition of a conflict pertaining to HIMCO's President's service on an external board of directors.
- Item 12 was updated to:
  - Reference both bids and offers in the discussion of best execution (instead of just bids);
  - Add data and analytics to the bundled products and services HIMCO received from counterparties in 2024;
  - Remove outdated language pertaining to client directed brokerage;
  - Clarify who must approve an exception request to use a trade allocation methodology other than pro rata.

*HIMCO will provide you with a new Brochure at any time upon request without charge. You may request a Brochure by email at [HIMCOADV@himco.com](mailto:HIMCOADV@himco.com) or by phone at (860) 297-6700. The Brochure is also available on HIMCO's website free of charge at [www.himco.com](http://www.himco.com). Additional information about Harford Investment Management may also be obtained on the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

### **ITEM 3: TABLE OF CONTENTS**

Item 1: Cover Page .....	1
Item 2: Material Changes .....	2
Item 3: Table of Contents .....	3
Item 4: Advisory Business .....	4
Item 5: Fees and Compensation .....	8
Item 6: Performance-Based Fees and Side-by-Side Management .....	11
Item 7: Types of Clients .....	13
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss .....	14
Item 9: Disciplinary Information .....	28
Item 10: Other Financial Industry Activities and Affiliations .....	29
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	31
Item 12: Brokerage Practices .....	34
Item 13: Review of Accounts .....	39
Item 14: Client Referrals and Other Compensation .....	40
Item 15: Custody .....	41
Item 16: Investment Discretion .....	42
Item 17: Voting Client Securities .....	43
Item 18: Financial Information .....	46

## **ITEM 4: ADVISORY BUSINESS**

### **A. General Description of Advisory Firm**

Hartford Investment Management Company (“HIMCO”) is registered with the Securities and Exchange Commission as an investment adviser and is a wholly owned subsidiary of The Hartford Insurance Group, Inc. (“The Hartford”), a publicly traded company. HIMCO was organized in 1996 by acquiring the business, personnel and corporate name of an affiliate that had been in operation since 1981 and that performed substantially similar services. Because HIMCO succeeded to the same business and utilized the same personnel as the affiliate prior to the acquisition, the affiliate's historical information is included with HIMCO's.

HIMCO provides investment advisory services primarily to institutional clients and private funds. HIMCO's institutional clients are mainly comprised of affiliated and unaffiliated insurance companies, corporations, and employee benefit and pension plans. The private funds managed by HIMCO are portfolios owned by unaffiliated insurance company separate accounts that meet the definition of private fund.

As of December 31, 2024, HIMCO managed approximately \$111.9 billion in fixed income, equity and alternative assets. (Please see [\*\*Section E of this Item 4\*\*](#) below for further disclosure regarding assets under management.)

### **B. Description of Advisory Services**

HIMCO provides discretionary and non-discretionary investment advisory services to institutional clients, including its affiliates. HIMCO's institutional clients are mainly comprised of affiliated and unaffiliated insurance companies, corporations, and employee benefit and pension plans.

In addition, HIMCO provides:

- Sub-advisory services with respect to a registered investment company, which is sponsored and distributed by entities unaffiliated with HIMCO;
- Sub-advisory services to unaffiliated SEC registered investment adviser(s);
- Advisory services to the private funds described above, which are exempt from registration under the Investment Company Act of 1940 (“1940 Act”) and are sponsored and distributed by entities unaffiliated with HIMCO; and
- Portfolio consulting services for a number of unit investment trusts registered under the 1940 Act that are sponsored and distributed by entities unaffiliated with HIMCO. As of the date of this brochure HIMCO no longer provides portfolio consulting services for new unit investment trusts but continues to provide support for certain existing trusts launched prior to February 29, 2024, until such trusts mature or terminate.

HIMCO's principal strategies include those listed below. In addition, HIMCO provides customized insurance asset management services that utilize its broad capability set across both public and private markets. HIMCO has the ability work with clients to construct and manage multi-asset, multi-strategy mandates that seek to meet the specific objectives, outcomes and risk profiles of each insurance client.

#### **Fixed Income**

HIMCO manages fixed income assets by using a disciplined process which is designed to create value from three sources: (i) a macro-economic strategy that considers duration and yield curve, (ii) strategic asset allocation, and (iii) security selection. Please see [\*\*Item 8\*\*](#) for a description of the fixed income investment process.

- **Core Fixed Income** - The objective of the Core Fixed Income strategy is to actively manage a high quality diversified fixed income portfolio in which accounts are normally comprised of at least 90% U.S. dollar denominated investment grade securities (such as obligations of the U.S. Government,

its agencies and instrumentalities, corporate debt, asset-backed securities and mortgage-backed and other mortgage-related securities) and with duration similar to broad market benchmark indices such as the Bloomberg U.S. Government/Credit Index or the Bloomberg U.S. Aggregate Index. The strategy can use derivatives, such as options, futures and swaps, which can be illiquid, can disproportionately increase losses, and have a potentially large impact on performance.

- High Quality High Yield - The objective of the High Quality High Yield strategy is to actively manage a high quality high yield (BB) portfolio in which accounts are normally invested at least 90% in BB tier high yield and emerging market fixed income securities. Investments in high-yielding, lower-rated securities involve risks beyond those inherent in higher-rated investments. Investments in foreign securities, including emerging markets, involve risks beyond those inherent in solely domestic investments. Foreign securities are subject to certain risk of overseas investing, including currency fluctuations and changes in political and economic conditions. These risks are magnified in emerging markets. The strategy can use derivatives, such as options, futures and swaps, which can be illiquid, can disproportionately increase losses, and have a potentially large impact on performance. The benchmark is the Bloomberg Ba U.S. Corporate High Yield Index 2% Issuer Cap-Sector Neutral.
- Long Duration Corporate Fixed Income - The objective of the Long Duration Corporate Fixed Income strategy is to actively manage a high quality diversified fixed income portfolio in which accounts are predominately comprised of investment grade corporate securities and have a duration similar to long duration benchmark indices, such as the Bloomberg Long U.S. Corporate Index. The strategy can use derivatives, such as options, futures and swaps, which can be illiquid, can disproportionately increase losses, and have a potentially large impact on performance.
- Passive U.S. Aggregate Bond Index - The objective of the Passive U.S. Aggregate Bond Index strategy is to manage a fixed income portfolio in which accounts are managed to replicate the performance of the Bloomberg U.S. Aggregate Index. The strategy will only invest in bonds which are in the Bloomberg U.S. Aggregate Index or bonds with the same issuer or obligor as those in the Index. The strategy can use derivatives, such as options, futures and swaps, which can be illiquid, can disproportionately increase losses, and have a potentially large impact on performance.
- Short Duration - The objective of the Short Duration strategy is to seek attractive investments considering both yield and total return in which accounts are normally comprised of at least 65% investment grade securities and have the ability to invest up to 35% in non-investment grade securities (as well as bank loans or loan participation interests). The strategy, under normal circumstances, will maintain an average credit quality of at least Baa3 by Moody's and a dollar weighted average duration and average maturity of less than 3 years. Permitted investments include but are not limited to U.S. dollar denominated corporate issues, commercial mortgage-backed securities, asset-backed securities, mortgage-related securities, securities issued or guaranteed by the U.S. Government, and up to 25% of its total assets in securities of foreign issuers. The strategy can use derivatives, such as options, futures and swaps, which can be illiquid, can disproportionately increase losses, and have a potentially large impact on performance. The benchmark is the Bloomberg 1-3 Year U.S. Government/Credit Index.

## Equity

HIMCO manages equity assets using passive equity strategies. Please see [Item 8](#) for a description of the equity investment process.

- Indexed Large Cap Equity - The objective of the Indexed Large Cap strategy is to replicate the total return of the S&P 500 Index by investing at least 95% in listed U.S. equity securities. The strategy benchmark is the S&P 500 Index.

## **Alternative Assets**

HIMCO also manages alternative asset strategies. Please see [Item 8](#) for a description of the investment processes associated with these strategies.

- **Commercial Mortgage Loans** - The objective of the Commercial Mortgage Loan strategy is to capture the spread premium over single A-rated public corporate industrials to compensate the investor for liquidity risk while providing enhanced structural protections through negotiated covenants, security or priority of payment. HIMCO seeks to achieve this objective by originating commercial mortgage loans on a non-recourse, permanent-financing, construction, fixed and/or floating-rate basis. The strategy targets investments in property types, such as industrial/warehouse, multifamily, retail, and office, with a loan-to-value ("LTV") ratio that generally falls within the range of 50%-70% with typical deal sizes ranging from \$20 to \$50 million. The strategy seeks to provide a well-constructed portfolio that delivers to our clients enhanced credit diversification due to access to issuers not available in the public markets and whose performance dynamics differ substantially from corporate credit risk. The process employed relative to this strategy enforces disciplined underwriting standards, utilizing specific criteria for each investment to build a diversified portfolio of loans in terms of borrowers, geography, and asset class.
- **Infrastructure and Energy Transition** – The Infrastructure and Energy Transition ("IET") Group targets private equity investments focused on a variety of strategies. The objective of the IET strategy is to seek attractive capital gains with relatively lower capital losses by exploiting the asymmetric return opportunities that we believe exist in the infrastructure/energy transition market. IET primary investment strategies include: 1) investing in private equity focused on value-add investments; and (2) investing in direct equity co-investments, alongside established fund managers. With respect to funds, the IET Group focuses on multiple program segments, including equity funds, growth equity funds, secondary funds and credit funds. In terms of direct equity co-investments, the IET Group seeks to invest alongside the funds in equity or preferred structures directly into the fund's portfolio companies. The IET Group seeks fund and co-investment opportunities across the energy transition, traditional infrastructure, and digital infrastructure sectors. The IET Group also makes opportunistic investments outside of these primary sectors for their return, diversification or risk-mitigating characteristics.
- **Private Equity (Funds and Equity Co-Investments)** - The Private Equity Group participates in the private equity market through a variety of strategies. The three primary strategies consist of: 1) investing in domestic lower middle market private equity buyout funds; 2) investing in private equity funds that offer diversification and high return expectations, outside of the lower middle market; and 3) investing in direct equity co-investments, alongside of a fund, in their portfolio companies. The core strategy is to invest in lower middle market or middle market U.S.-focused buyout firms. The U.S. middle market segment offers potential value relative to other private equity strategies due to its potentially greater transaction inefficiencies, lower purchase multiples, lower leverage, and greater number of companies and transactions. However, the strategy does opportunistically invest in fund strategies outside the middle market buyout space. These non-core investments are targeted for their potential return, diversification or risk mitigating characteristics. The equity co-invest program leverages general partner relationships developed through fund investing and these general partners largely represent the origination platform of the direct equity co-invest program. Across all areas (funds and equity co-investments), the objective of the private equity strategy is to seek strong absolute and risk-adjusted return opportunities that balance the potential for gains with the probability of capital loss.
- **Private Placements** - The objective of the Private Placement Fixed Income strategy is to seek relative value debt investment opportunities with the objective of capturing a premium relative to comparable public bonds. This is carried out by investing mainly across the investment grade private credit market, while structuring the portfolio to effectively manage risk. The strategy focuses on both current income generation and capital appreciation with a priority on income generation. The strategy is multi-dimensional, considering credit risk, long-term nominal and relative spreads,

as well as select return opportunities. The Private Placement strategy starts with the premise that private placements are less liquid than publicly traded bonds. Based on this premise, we take a long-term view in our security selection, portfolio construction and value metrics. The process employed in this strategy is built upon fundamental credit and relative value analysis and follows a disciplined and consistent approach in an effort to fully understand and adequately price the risks inherent in each transaction.

**Conflicts Inherent in Agreement to Provide Advisory Services**

In addition to the specific conflicts of interest noted elsewhere in this document, there are conflicts of interest inherent to entering into HIMCO's standard investment management agreement ("IMA"). For example, HIMCO includes an indemnification and exculpation provision (a "hedge clause") in its IMA. The hedge clause exculpates HIMCO from liability and imposes indemnification obligations on the client with respect to losses, liabilities and other damages incurred unless HIMCO has failed to abide by the standard of care set out in its IMA. HIMCO's standard IMA also includes a non-waiver provision which states that certain laws, including federal securities laws, impose liabilities (under certain circumstances) on persons who act in good faith, and therefore the hedge clause does not waive any rights a client has under such laws. For example, a client cannot waive HIMCO's fiduciary duty as a registered investment adviser under federal law via contract. Such a hedge clause creates a conflict of interest between HIMCO and its client as it contractually limits HIMCO's liability to its client and subjects the client to the risk of having to indemnify HIMCO under certain circumstances. This conflict of interest is characteristic of the conflict of interest that exists with respect to all aspects of any agreement to provide services because the provider of the service (here, HIMCO) and the recipient of the service (here, the client) are on "opposite sides" of the contract resulting in their interests being adverse with respect to each term of the contract.

**C. Availability of Customized Services for Individual Clients**

As a general rule, HIMCO will tailor its advisory services for separately managed client accounts based on a client's particular needs, including the client's overall financial condition, goals, risk tolerance and other factors unique to a client's particular circumstances. In addition, HIMCO typically will tailor investment guidelines for separately managed client accounts in order to restrict investments in certain securities or asset classes as requested by the client.

**D. Wrap Fee Programs**

HIMCO does not participate in a wrap fee program.

**E. Assets Under Management**

As of December 31, 2024, HIMCO had approximately \$111.9 billion of assets under management:

	<u>U.S. Dollar Amount</u>
Discretionary	\$107,742,787,652
Non-Discretionary	\$4,181,826,721
<b>Total</b>	<b>\$111,924,614,373</b>

## **ITEM 5: FEES AND COMPENSATION**

### **A. Advisory Fees and Compensation**

HIMCO typically receives a percentage of assets under management as compensation for its advisory services. HIMCO's standard fee schedules for unaffiliated clients in principal strategies are provided below. Fee schedules for different styles of investment management will vary depending on research intensity, degree of active management and size of the account. HIMCO, from time to time, negotiates terms and charges different fees for certain accounts based on a client's particular needs, goals, risk tolerance, servicing requirements, and other factors unique to the client or their mandate. Fee schedules change over time and thus accounts with differing inception dates can have different fee schedules. HIMCO retains the right to enter into agreements where the fees charged for a particular account will be the lowest fees charged for a given strategy. Clients that negotiate fees with differing breakpoints than those outlined in the standard fee schedules below could end up paying a higher or lower fee than that set forth below due to fluctuations in the client's assets under management and/or account performance.

HIMCO's standard fee schedules for unaffiliated clients in principal strategies are as follows. See [Item 7](#) for minimum account sizes.

<b><u>Asset Class</u></b>	<b><u>Principal Strategy</u></b>	<b><u>Assets</u></b>	<b><u>Fee (basis points)</u></b>
Fixed Income	Core Fixed Income	First \$75 million	25
		Next \$100 million	20
		Next \$300 million	18.5
Fixed Income	High Quality High Yield	First \$25 Million	50
		Next \$75 Million	40
		Next \$100 Million	35
		Over \$200 Million	Negotiable
Fixed Income	Long Duration Corporate Fixed Income	First \$25 Million	30
		Next \$75 Million	25
		Over \$100 million	20
Fixed Income	Passive U.S. Aggregate Bond Index	First \$100 Million	15
		Next \$400 Million	7
		Over \$500 Million	5
Fixed Income	Short Duration	First \$75 Million	20
		Next \$100 Million	15
Equity	Indexed Large Cap Equity	N/A	12.5
Alternative Assets	Commercial Mortgage Loans	N/A	25
Alternative Assets	Private Placements	N/A	25
Alternative Assets	Private Equity: <ul style="list-style-type: none"><li>• Funds</li><li>• Equity Co-investments</li></ul>	Fees for private equity investment services are dependent on the structure and nature of the investment (e.g. fund, equity co-investment). Fees are negotiable based on factors including but not limited to type of investment, size of account, the discretionary or non-discretionary nature of the mandate, and other relationships with HIMCO. Total investment management fees can be comprised of various components including, but not limited to, asset-based management fees and carried interest or other performance-based fees.	

<b>Asset Class</b>	<b>Principal Strategy</b>	<b>Assets</b>	<b>Fee (basis points)</b>
Alternative Assets	Infrastructure and Energy Transition <ul style="list-style-type: none"> <li>• Funds</li> <li>• Equity Co-investments</li> </ul>	Fees for infrastructure and energy transition investment services are dependent upon the structure and nature of the investment. Fees are negotiable based on factors including but not limited to type of investment, size of account, the discretionary or non-discretionary nature of the mandate, and other relationships with HIMCO. Total investment management fees can be comprised of various components including, but not limited to, asset-based management fees and carried interest or other performance-based fees.	

In addition to the standard fee schedules for unaffiliated clients in principal strategies outlined above:

- HIMCO, at its discretion, offers alternative fee schedules for broader investment advisory mandates covering multiple strategies and asset classes whereby the client pays a negotiated annual rate (in basis points) by asset class.
- With respect to its role as sub-adviser to a 1940 Act registered investment company sponsored by an unaffiliated entity, the adviser to the fund pays HIMCO a monthly management fee based on an annual rate calculated as a stated percentage of the fund's average daily net assets. The annual rate is tiered based on the size of the fund.
- With respect to providing sub-advisory services to other SEC registered investment adviser(s), HIMCO is paid a quarterly fee by the adviser that is derived by multiplying the average value of account assets on the last business day of each month of the then ended calendar quarter by one quarter of the agreed upon annual sub-advisory fee rate. Depending on the adviser, the annual rate is either a tiered rate based on the size of all accounts sub-advised to HIMCO by the adviser in the same or similar investment strategies, or a flat rate.
- With respect to unit investment trusts that were launched prior to February 29, 2024 and for which HIMCO served as portfolio consultant, until such trusts are terminated or mature, HIMCO will receive an annual fee based on a percentage of the net asset value of the unit investment trust as of the end of each calendar year.
- HIMCO is reimbursed for costs incurred for providing investment advisory services to its affiliates. In addition, HIMCO is a wholly owned subsidiary of The Hartford and HIMCO's employees are compensated by The Hartford (please refer to [Item 6](#) for additional information).

## **B. Payment of Fees**

HIMCO does not deduct its advisory fees from client accounts. Fees are typically invoiced to HIMCO by unaffiliated institutional clients quarterly in arrears based on the quarter-end market value or average market value for the quarter. If a client terminates the relationship prior to the end of a period, the fee is prorated for the number of days in the period prior to termination.

Monthly management fees associated with sub-advising a 1940 Act registered investment company are generally paid by the fund's adviser to HIMCO monthly in arrears. Quarterly sub-advisory fees associated with providing sub-advisory services to other SEC registered investment adviser(s) are generally paid by the adviser to HIMCO quarterly in arrears. The annual fees paid to HIMCO for serving as portfolio consultant to unit investment trusts launched prior to February 29, 2024 are invoiced to and paid by the sponsor of the unit investment trusts.

HIMCO is reimbursed through an internal expense allocation process for the costs incurred for providing investment advisory services to its affiliates and HIMCO's employees are compensated through The Hartford's payroll process.

### **C. Additional Fees and Expenses**

Clients pay all interest, charges, taxes, fees, commissions, transaction-related expenses and other expenses related to their account. HIMCO, in its discretion, also passes expenses through to clients from third parties performing certain services related to their account(s). In addition, clients whose uninvested assets are swept into money market mutual funds for short-term cash management purposes either by HIMCO or by their custodian will also bear the additional fees and expenses assessed by such money market mutual funds to the extent of their investment in such funds. To the extent that the investment guidelines for an account permit the investment of account assets in mutual funds or other collective investment vehicles, the account will bear any fees and costs associated with such collective investment vehicles, as well as the investment advisory fee of HIMCO. Clients investing directly in a mutual fund sub-advised by HIMCO will bear the fees and expenses disclosed in such mutual fund's prospectus.

If so authorized by a client, HIMCO will include the client in its process for filing class action claims involving issuers of securities or other assets held in advisory accounts managed by HIMCO. HIMCO reserves the right, in its discretion, to pass through to participating clients the pro-rata costs of participating in such legal actions.

### **D. Prepayment of Fees**

Subject to the following exception, clients of HIMCO are not required to pre-pay investment advisory fees.

While individual circumstances can vary by client, HIMCO commercial mortgage loan only clients typically pay a portion of a month's worth of master servicing fees at each loan's closing to cover the partial month from loan closing to month end ("stub period"). The client sends the fee alongside their portion of the loan proceeds on the day of closing. Should the client terminate its relationship with HIMCO prior to the end of that month, HIMCO could be improperly incentivized to retain the unearned portion of the prepaid fee. To mitigate this conflict, HIMCO has procedures in place to prompt a refund of the unearned (pro-rated) portion of the master servicing fee for the stub period.

### **E. Additional Compensation and Conflicts of Interest**

HIMCO's supervised persons do not receive compensation for the sale of securities or other investment products. HIMCO does charge higher fees for advisory services associated with certain investment strategies as evidenced in its standard fee schedules above. This creates a conflict of interest in that HIMCO has the incentive to recommend these investment strategies to clients to increase HIMCO's fee income, rather than basing its recommendation on a client's investment needs. This conflict is mitigated by: (i) the fact that HIMCO supervised persons do not receive compensation for the sale of securities or other investment products; (ii) HIMCO's practice of seeking to understand its clients' investment objectives and risk tolerances and provide appropriate investment options tailored to its clients' needs; and (iii) HIMCO's Code of Ethics that requires that supervised persons place the interests of HIMCO's clients above their own, and minimize or mitigate any conflict of interest or the appearance of a conflict of interest between their self-interest and that of HIMCO, The Hartford, its shareholders and/or any of HIMCO's clients.

## **ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

While HIMCO does not receive traditional performance-based fees on the accounts it manages as of the date of this Brochure, HIMCO is a wholly owned subsidiary of The Hartford and HIMCO's employees are compensated by The Hartford. Such compensation includes, without limitation, salary and variable compensation that is based, in part, on HIMCO's success in meeting its objectives, including the performance objectives of its affiliated clients. Certain HIMCO investment professionals manage both affiliated and unaffiliated client accounts. Management of client portfolios with varying investment objectives, strategies, risk profiles, affiliations, and/or fee structures raises conflicts of interest for HIMCO and its personnel, including:

- The prospect of earning higher compensation from a portfolio with a higher fee structure creates an incentive for the portfolio manager to favor the portfolio with the higher fee structure when it comes to allocating his or her time across portfolios or allocating investments.
- Performance-based fees provide an incentive for HIMCO to purchase investments that are more speculative and/or involve a higher degree of risk than might otherwise be the case in the absence of such performance-based compensation.
- The fact that HIMCO provides investment advisory services to affiliated and unaffiliated clients creates the incentive to favor affiliated clients when allocating portfolio management time across portfolios or allocating investments.
- Where HIMCO's fees are based on account values, HIMCO benefits from the increased value of assets in an account. If a security held in an account does not have a readily available market value, a conflict arises in that HIMCO's interests would be served by placing the highest possible value on that security.
- If HIMCO pursues or enforces the rights of certain HIMCO clients with respect to an issuer it could have a negative impact on the investments of other clients in the same issuer. For example, if certain HIMCO clients hold investments in the debt securities of an issuer which has become financially impaired and other clients hold the equity securities of the same issuer, or if multiple clients hold investments in different tranches of an issuer's debt securities, the prices, liquidity, availability and terms of certain clients' investments could be adversely affected by actions taken on behalf of other clients.
- Portfolio managers manage portfolios for multiple clients. Portfolio managers make investment decisions for each client based on the investment objectives, strategies, risk tolerance, practices and other relevant investment considerations applicable to that client. Consequently, portfolio managers can (i) purchase or sell securities for one client and not another; (ii) purchase or sell the same security for different clients at different times; (iii) place transactions on behalf of one client that are directly or indirectly contrary to investment decisions made on behalf of other clients; or (iv) make investment decisions for one client that are similar to those made for other clients, all of which have the potential to positively or negatively impact one client and not another, depending on market conditions.
- Certain portfolio managers manage portfolios for both discretionary and non-discretionary clients. If non-discretionary clients decline recommendations to add to or modify an existing investment, a portfolio manager could face the conflict of having to manage portfolios that have conflicting, differing, or misaligned interests in one or more existing investments. A similar conflict could result from clients restricting or limiting certain types of investments as part of their investment guidelines.

HIMCO's goal is to provide high quality investment advisory services to all of its clients and meet its fiduciary obligation to treat all clients fairly. HIMCO has adopted and implemented policies and procedures to address the conflicts noted above. These include, but are not limited to:

- Trade Allocation Policy and Procedures that establish requirements for the fair and equitable allocation of investment opportunities across client accounts. The Trade Allocation Policy and Procedures include controls designed to:
  - Facilitate sharing of investment ideas by investment personnel for the benefit of applicable client accounts, subject to certain documented exclusions;
  - Require the use of allocation statements for aggregated orders;
  - Surveil aggregated orders that received partial fills to verify that the partial fill was allocated in accordance with the policy; and
  - Establish allocation and reallocation protocols under various scenarios.

Please refer to [Item 12](#) for additional information on HIMCO's Trade Allocation Policy and Procedures.

- The Code of Ethics requires that supervised persons place the interests of HIMCO's clients above their own, and minimize or mitigate any conflict of interest, or the appearance of a conflict of interest, between their self-interest and that of HIMCO, The Hartford, its shareholders and/or any of HIMCO's clients.
- Pricing Policy and Procedures that establish controls to manage the conflict posed by pricing securities for which there is no readily available market value, including but not limited to requiring the appropriate segregation of duties within the valuation process.

## **ITEM 7: TYPES OF CLIENTS**

HIMCO provides discretionary and non-discretionary investment advisory services to institutional clients, including its affiliates. HIMCO's institutional clients are mainly comprised of affiliated and unaffiliated insurance companies, corporations, and employee benefit and pension plans. In addition, HIMCO provides:

- Sub-advisory services with respect to a registered investment company, which is sponsored and distributed by entities unaffiliated with HIMCO.
- Sub-advisory services to unaffiliated SEC registered investment adviser(s).
- Advisory services to private funds exempt from registration under the 1940 Act, which are sponsored and distributed by entities unaffiliated with HIMCO. The private funds managed by HIMCO are portfolios owned by unaffiliated insurance company separate accounts that meet the definition of private fund.
- Portfolio consulting services for a number of unit investment trusts registered under the 1940 Act that are sponsored and distributed by entities unaffiliated with HIMCO. As of the date of this brochure HIMCO no longer provides portfolio consulting services for new unit investment trusts but continues to provide support for certain existing trusts launched prior to February 29, 2024, until such trusts mature or terminate.

As a general rule:

- HIMCO requires: (i) a minimum of \$40 million for starting or maintaining a fixed income mandate in an active strategy; (ii) a minimum of \$100 million for starting or maintaining a fixed income mandate in a passive strategy.
- HIMCO requires a minimum of \$10 million for starting or maintaining a passive domestic equity mandate.
- HIMCO requires a minimum of \$100 to \$150 million for starting or maintaining a discretionary commercial mortgage loan or private placement account. Non-discretionary commercial mortgage loan and private placement accounts do not have an investment minimum.
- HIMCO requires a minimum of \$50 million for starting or maintaining a discretionary private equity/equity co-investment account.
- HIMCO requires a minimum of \$50 million for starting or maintaining a discretionary infrastructure and energy transition account.

HIMCO retains the right to negotiate or waive its investment minimums based on a number of factors including, without limitation:

- Whether the strategy is investable at a certain size considering market liquidity, applicable regulatory constraints, and other factors;
- Whether appropriate diversification is achievable at a certain size; and
- Whether managing the strategy at a certain size would be profitable to HIMCO.

## **ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

***Investing in securities involves the risk of loss including possible loss of principal that clients should be prepared to bear.***

### **INVESTMENT PROCESS**

HIMCO manages investment portfolios using a top-down and bottom-up investment process, with multiple levels of investment input, within a governance framework that is designed to ensure thematic consistency (to the extent mandates are similar). Ultimately, portfolio managers are responsible for portfolio construction that draws upon the resources of HIMCO and pursues client objectives within the constraints set by the client. The investment process, inputs, and governance structure are outlined below.

In addition to individual portfolio managers and various functional specialists (sector and industry analysts, traders, and macroeconomic and quantitative analysts), there are two groups exerting significant influence over HIMCO's investment process. HIMCO's Investment Strategy Committee ("ISC") has overall responsibility for all aspects of the investment process. The ISC is chaired by HIMCO's President and is comprised of senior investment professionals. A formal outlook is presented to the ISC for discussion on at least a quarterly basis. Various economic and capital market scenarios are outlined and sector specialists offer their view on their asset class/sector's likely performance in each of the defined scenarios. Through the quarterly ISC process, a HIMCO view is developed for an intermediate term outlook on growth, rates, inflation and overall portfolio risk appetite.

Many ISC responsibilities are performed through the Portfolio Strategy Group ("PSG"). The PSG is a cross-functional team comprised of key consumers and providers of investment information including representation from the portfolio management, credit research, macroeconomic, sector, and trading teams. The primary role of the PSG is to make regular recommendations on broad portfolio strategy issues, such as tactical asset allocation and risk taking, for an abstract, unconstrained theoretical portfolio. The PSG meets regularly to discuss developments across three main areas (i) economic data releases and overall economic trends, (ii) market pricing vs. economic fundamentals and (iii) recommended asset allocation positioning of portfolios. The PSG coordinates the input of macroeconomists, senior portfolio managers, sector heads, research analysts, and traders, in examining critical structural drivers of the U.S. and global economies. This includes fiscal and monetary conditions, growth and inflation data and trends, geo-political events and policy initiatives.

Portfolio managers are responsible for the ultimate investment decision and the construction of their assigned portfolios. Portfolio managers synthesize information and analysis provided by the PSG, sector teams and others in formalizing and implementing portfolio-level decisions. Portfolio managers also have the ability to engage the PSG and sector teams as needed in ad hoc scenario and portfolio optimization analysis as economic conditions, market technicals, or price or volatility relationships evolve.

### **Sustainable Investing**

HIMCO believes that sustainability factors are among the considerations that inform and can influence an investment's risk and return profile over time. HIMCO incorporates sustainability considerations into the portfolio construction process where appropriate based on client guidelines, objectives, and limitations or where otherwise informed by the client. The incorporation of sustainability factors into the investment analysis and decision-making process provides a robust assessment of the risks and opportunities associated with investment decisions. HIMCO research analysts and portfolio managers consider sustainability factors such as climate change, natural resources, pollution and waste, human capital, product safety, social opportunity, corporate governance and ethics along with a range of other business and financial risk factors when assessing the probability of an impact on the value and performance of investments over time. HIMCO's policies and procedures establish controls to foster consistency across the sustainable investment process, related disclosures, and corresponding marketing efforts.

## **FIXED INCOME**

### Methods of Analysis

HIMCO manages fixed income portfolios using a disciplined process designed to generate value from three sources: (i) a macro-economic strategy that considers duration and yield curve (ii) strategic asset allocation and (iii) security selection. Each of these three value levers is analyzed within a three-pronged framework: fundamentals, market pricing, and market technicals. Fundamental analysis encompasses the review of issuer operations, profitability, liquidity and leverage metrics, and structural characteristics of an investment, along with an assessment of the trajectory of key drivers that will impact an issuer's future performance and credit profile. Analysis focuses on industry and macro trends that impact an issuer, as well as examining the state of financial markets and issuers' access to capital. Attention to event risk and risk rating migration are also a critical part of the analysis. Fundamental analysis includes an assessment of the structural aspects of an issuer's debt profile, including without limitation, relative priority in the capital structure and financial covenants. Market pricing of securities is examined, and an evaluation is made by various specialist teams to determine if market prices accurately reflect fundamentals and relative value within industry, risk ratings and sector constructs. Market technicals are assessed by reviewing fund flows, supply and demand, deal activity and synthetic activity (as applicable). At times, dislocations in pricing present opportunities to buy or sell in the markets or securities examined. HIMCO implements buy and sell decisions leveraging in-house market expertise and execution capabilities.

### Risks

Fixed income investments are subject to the following primary risks:

- Credit Risk - The risk that the issuer of a security will not be able to make timely principal and interest payments.
- Interest Rate Risk - The risk that investments go down in value when interest rates rise because when interest rates rise the prices of bonds and fixed rate loans fall. Generally, the longer the maturity of a bond or fixed rate loan, the more sensitive it is to this risk. These risks are greater during periods of inflation. Falling interest rates also create the potential for a decline in a fixed income portfolio's income.
- Prepayment Risk - The risk that when interest rates decline, borrowers will pay off their obligations sooner than expected. This can reduce the returns of a portfolio because HIMCO will have to reinvest that money at lower prevailing interest rates.
- Recovery Risk - The risk that a security holder will not recover some or all of its principal after a security has defaulted.

In addition, certain fixed income investments are subject to additional primary risks:

- Below-Investment Grade Risk - Securities rated below investment grade (also referred to as "high yield" or "junk" bonds) are subject to heightened credit risk as these securities are typically issued by entities with higher leverage and/or lesser scale. Lower rated debt securities generally involve greater risk of default or price changes due to changes in the issuer's creditworthiness than higher rated debt securities. The market prices of these securities generally fluctuate more than higher quality securities and may decline significantly in periods of general economic difficulty.
- Call Risk - The risk that an issuer, during a period of falling interest rates, will redeem a security by repaying it prior to maturity. Income to the portfolio will be reduced if the proceeds from the redemption are reinvested at lower interest rates.
- Collateral Risk - The risk that the value of collateral will be insufficient to cover payment obligations.
- Credit Ratings Risk - Credit ratings are assigned to securities through a rating agency's assessment of the issuer's financial strength. Generally, the lower the quality rating, the greater the risk that the

issuer will fail to pay interest and return principal. The use of credit ratings in evaluating debt instruments can involve certain risks, including the risk that the credit rating may not reflect the issuer's current financial condition or events since the security was last rated by a rating agency. Credit ratings are only an agency's opinion, not an absolute standard of quality, and they may not reflect an evaluation of market risk or the true risks of an investment. Changes to an issuer's credit rating may affect the value of the issuer's debt securities.

- Currency Risk - The risk that changes in the exchange rate between currencies will adversely affect the value of an investment or an issuer's credit profile.
- Extension Risk - The risk that, generally, rising interest rates tend to extend the duration of fixed rate mortgage-backed securities, making them more sensitive to changes in interest rates causing the potential for additional volatility.
- Liquidity Risk - The risk that certain securities are difficult or impossible to sell at the time that the seller would like or at the price that the seller believes the security is currently worth. Such fixed income securities may also be difficult to value. Alternative assets are generally less liquid than other types of fixed income securities. The liquidity of fixed income securities can also be negatively impacted by rising interest rates and decreases in fixed income dealer market making capacity.
- Structural Risk – The risk that results from the financial structure of an investment and the rights that the structure provides to participants/investors. Certain fixed income investments are structured investments, which may be issued in multiple tranches that offer investors various maturity and credit risk characteristics. In addition, some are subordinated investments (in right of payment and/or security), which may be characterized by greater credit risks than those associated with the senior obligations of the same issuer or structurally senior obligations of a subsidiary issuer. Adverse changes in the financial condition of an issuer, general economic conditions, or both may impair the ability of such an issuer to make payment on subordinated securities and result in defaults on such securities more quickly than in the case of the senior obligations of such issuer. Different classes or tranches of debt could have different covenant packages. Holders of subordinated debt generally are not entitled to receive payment in bankruptcy or liquidation until senior creditors are paid in full. Further, remedies available to holders of subordinated debt are normally limited by restrictions benefiting senior creditors.

For information on the principal investment strategy and complete set of risks applicable to the AAM/HIMCO Short Duration Fund please refer to the fund's prospectus and statement of additional information.

## **EQUITY**

### **Methods of Analysis**

HIMCO manages equity assets using passive equity strategies. HIMCO seeks to match the attributes of the underlying index in order to deliver comparable performance. Portfolio managers seek to keep each portfolio fully invested, minimizing unexposed cash. Each portfolio's active risk, as well as security, sector, and country exposures are assessed utilizing portfolio management software. Exposure to domestic and international currencies, where applicable, is also reviewed.

Managing tightly to an index requires in-depth knowledge of each index provider's methodology. Most indices add, delete, and/or modify the weight of constituents through a quarterly rebalance process. The passive equity team's portfolio management software incorporates the new index security weights as a forward-looking benchmark. Portfolio managers utilize this software to reposition the portfolio from the current index weights to the new index weights. An optimization is typically employed to minimize tracking error and minimize security active weights between the portfolio and index.

There are also situations where material events require ad hoc changes to the index outside of the quarterly rebalance process. Portfolio managers buy and sell securities when necessary to stay in line with the index. In these situations, portfolio managers model the index event in the portfolio management software to

assess the impact on the index. Portfolio managers then enter any transactions necessary to bring the security's weight closer to the index weight.

For certain passive index strategies, portfolio managers also manage currency forward contracts in a manner consistent with that of the relevant index providers in order to minimize tracking error in the applicable portfolios.

## Risks

HIMCO's public equity strategies involve the following primary risks:

- Foreign Investment Risk - Certain HIMCO equity strategies invest in foreign equity securities (including foreign stock, emerging markets securities and American Depository Receipts, which are certificates that represent a specified number of shares of a foreign stock). These securities are subject to the risks associated with overseas investing, including:
  - The risk that changes in the exchange rate between currencies will adversely affect the value of an investment.
  - The risk that changes in political and economic conditions will adversely affect the value of an investment.
  - Securities markets in emerging market countries are generally less liquid, subject to greater price volatility, have smaller market capitalizations, have less government regulation and are not subject to as extensive and frequent accounting, financial and other reporting requirements as the securities markets of more developed countries.
  - The risk of tax claims whereby a foreign jurisdiction withholds dividends of foreign issuers at a non-resident withholding tax rate, a portion of which are slowly repaid only upon application for reclaim by the custodian.
- Market Risk - The risk that one or more securities in which a strategy invests will go down in value, including the possibility that the securities will go down sharply and unpredictably. Equity securities may decline in value due to the activities and financial prospects of individual companies or due to general market and economic movements and trends.
- Passive Management Risk - Passive equity strategies, by definition, are not actively managed. Instead they are designed to match the components of a reference index. Therefore, the adverse performance of a particular stock ordinarily will not result in the elimination of the stock from a passive equity portfolio. The portfolio will generally remain invested in a stock even when its price is falling, provided it continues to be a component of the portfolio's reference index.
- Small and Mid-Cap Company Risks - Equity strategies that invest in small or mid-sized companies involve higher risk than a strategy that invests in larger, more established companies. Small and mid-sized companies often have limited operating or business history. They also frequently rely on narrower product lines and niche markets, and thus, can suffer severely from isolated business setbacks. Small capitalization stocks are often more difficult to value or dispose of, more difficult to obtain information about and more volatile than stocks of larger, more established companies.
- Tracking Error Risk - Passive equity strategies are also subject to the risk of tracking error. Tracking error causes a passive equity strategy's performance to diverge from that of its reference index, either on a daily or aggregate basis. Factors such as cash flows, transaction costs, imperfect correlation between the portfolio's securities and those in the index, asset valuation, timing variances, changes to the composition of the reference index, and regulatory requirements are all potential causes of tracking error.
- Warrants and Rights Risk - Investing in warrants and rights involves greater risk than investments in common stock. If the price of stock underlying a warrant or right does not rise above the exercise price before it expires, the warrant or right generally expires without any value and the portfolio loses any amount it paid for the instrument. Warrants and rights generally trade in the same markets as their underlying stock. However, their price does not necessarily move with the price of the underlying stock.

## **ALTERNATIVE ASSETS**

### **Commercial Mortgage Loans (“CMLs”)**

#### **Methods of Analysis**

HIMCO originates CMLs in order to obtain a durable income stream while diversifying from public income credits (e.g. corporate bonds). CMLs are private investments with low liquidity that are typically held for the life of the CML. In return for this lack of liquidity, CMLs seek to achieve a “liquidity premium” over like-rated public income credits. In addition, HIMCO seeks to minimize its CML losses to be consistent with or better than like-rated public income credit. To achieve its CML objectives, HIMCO employs a top-down strategic approach to seek investments with characteristics (property type, market, and specific asset characteristics) that meet the desired client objectives. HIMCO also employs an in-house origination team utilizing a bottom-up strategy to create the CML opportunities to meet those objectives. HIMCO’s CML underwriters are assigned to geographic regions across the continental U.S. after they have developed market expertise as well as strong relationships with brokers and sponsors/borrowers in their designated region. CML opportunities are primarily sourced by a network of independent mortgage brokers representing borrowers, and HIMCO also deals directly with potential borrowers. HIMCO will periodically update the broker network on deal parameters of particular interest to HIMCO’s clients, including loan size and duration, property type, geographic location, and spread/coupon requirements. Underwriters conduct a detailed analysis of a loan opportunity considering a number of factors, such as collateral cash flows, occupancy/tenancy characteristics, market strengths and challenges, collateral value, quality and location, and the strength of the proposed sponsor/borrower. If the underwriter determines that a loan opportunity satisfies preliminary underwriting criteria and other portfolio/client requirements, the underwriter will review the proposed terms with the Head of Private Real Estate. Assuming that the Head of Private Real Estate concurs with the underwriter’s proposed deal terms, the underwriter circulates a proposal to the potential sponsor/borrower, which is then converted into an application after conceptual agreement by the proposed sponsor/borrower. The underwriting process culminates with written material and a verbal presentation to the Sector Investment Committee in a formal investment approval session. The Sector Investment Committee is a forum for a robust discussion of the merits and risks of a proposed investment.

#### **Risks**

CML investments are subject to the following primary risks:

- **Real Estate Investment Risk** - Commercial mortgage loans are subject to the uncertainty of borrower cash flow to meet fixed or variable obligations due to the risks incident to development and ownership of real estate, which include:
  - Changes in the general economic climate;
  - Changes in the overall real estate market;
  - Local real estate conditions;
  - The financial condition of buyers and sellers of properties;
  - Supply of or demand for competing rental space or properties in an area and variation of rental rates based on supply/demand factors;
  - Accelerated construction activity;
  - Tenant credit and leasing activity;
  - Technological innovations that alter space requirements;
  - The availability of financing;
  - Changes in interest rates;
  - Changes in operating expenses or capital expenditure costs
  - Competition based on sale prices;
  - Energy and supply shortages;
  - Various uninsured and uninsurable risks;
  - Deterioration of tenant credit; and
  - Government regulations.

- Risk of Environmental Matters - The real properties which secure commercial mortgage loans are subject to U.S. federal and state environmental laws, regulations and administrative rulings which, among other things, establish standards for the treatment, storage and disposal of solid and hazardous waste. Real property owners are subject to U.S. federal and state environmental laws which impose joint and several liability on past and present owners and users, and in some cases, lenders of real property for hazardous substance remediation and removal costs. To the extent it becomes an owner of property serving as collateral for a mortgage loan, a lender could be exposed to risk of loss from environmental claims arising in respect of undisclosed or unknown environmental problems or as to which adequate reserves have not been established. It is anticipated that the lender will not take title to a property unless said property is free of unacceptable environmental risks as established by an industry standard environmental study, and that if the lender takes title, it would be taken in the name of a separate legal entity.
- Creditor Risks - As debt, commercial mortgage loans generally are subject to various creditor risks, including (i) the possible invalidation of an investment transaction as a "fraudulent conveyance" under the relevant creditors' rights laws, (ii) so-called lender liability claims by the borrower, and (iii) as noted above, environmental liabilities that arise with respect to collateral securing the obligations. Additionally, adverse credit events with respect to any underlying real property or owner, such as missed or delayed payment of interest and/or principal, bankruptcy, receivership or credit issues suffered by tenants, can significantly diminish or adversely impact the collectability of commercial mortgage loans.
- Risk of Uninsured Losses - The lender will require borrowers to maintain insurance coverage against liability to third parties and property damage as is customary for similarly situated real property. However, there can be no assurance that insurance will be available or sufficient to cover any or all such risks. Insurance against certain risks, such as earthquakes, floods, or acts of terrorism may be unavailable, available in amounts that are less than the full market value or replacement cost of real property securing the commercial mortgage loan, or subject to a large deductible or not economically insurable. In addition, there can be no assurance that the particular risks that are currently insurable will continue to be insurable on an economic basis.
- Prepayment Risks - Despite a stated maturity date, commercial mortgage loans are subject to the risk of being prepaid prior to such maturity date. Borrowers on commercial mortgage loans typically have a right pursuant to the applicable loan documents to pre-pay their loan. Due to these pre-payments, market participants generally refer to a commercial mortgage loan's estimated average life. An average life estimate is a function of an assumption regarding anticipated prepayment patterns, which are based upon current interest rates, current conditions in the relevant end-use markets and other factors. The assumption is necessarily subjective, and there can be no assurance that estimated average life will correspond to a loan's actual life. To help mitigate this risk, in the event of an early payoff of the loan, a borrower is typically required to pay an additional sum (e.g. a fixed percentage of the amount of the loan being paid off or yield maintenance) to compensate the lender for its losses due to the lender having to re-invest the proceeds into a potentially lower yielding investment.
- Risk of Troubled Assets - Defaulted commercial mortgage loans operating in work-out mode or under bankruptcy protection laws are, in certain circumstances, subject to potential liabilities that could exceed the value of the original investment, including disallowance of claims or lender liability. In addition, under certain circumstances, payments to a lender may be reclaimed if any such payments or distributions are later determined to have been fraudulent conveyances or preferential payments under applicable law.
- Risk Related to Usury Limitations - Interest charged on commercial mortgage loan investments in certain jurisdictions is subject to usury laws imposing maximum interest rates and penalties for violation, including restitution of excess interest and unenforceability of debt.
- Risk Related to Uncertainty of Projections - The lender's determination to make a particular commercial mortgage loan will be based on a variety of projections, including projections regarding

future growth rates and demand in the applicable market, construction costs, insurance costs, market prices and disposition timing and proceeds, all of which are inherently uncertain. To the extent that the actual outcome of any of such matters differs from that assumed by the lender, actual net income and cash flow from the real property could be materially affected and could be materially lower than those projected.

### **Infrastructure and Energy Transition (Funds and Equity Co-Investments)**

#### **Methods of Analysis**

The Infrastructure and Energy Transition (“IET”) Group participates in the market through two primary strategies: (i) investing in funds (equity funds, growth equity funds, secondary funds, and credit funds); and (ii) investing in direct equity co-investments alongside managers in the fund’s portfolio companies. The IET Group primarily seeks to invest in the following sectors: energy transition, traditional infrastructure and digital infrastructure. However, the IET Group also makes opportunistic investments outside of these three primary sectors for their return, diversification or risk-mitigating characteristics.

For fund commitments, the IET Group leverages its deep sponsor relationships to originate deal flow. It seeks sponsors with: (i) compelling investment theses; (ii) histories of strong performance consistently produced across various timeframes and market environments; (iii) operating and industry expertise; and (iv) robust pipelines and consistent investment pacing. In addition, the IET group looks for sustainability of returns, an investment focus and expertise, and an active management style. The IET Group employs a disciplined underwriting approach that considers entry valuations and build multiples (as compared to broader market valuations) and a consistent review of market opportunities to ensure their selection criteria evolve alongside market trends.

In the case of direct equity co-investments, the diligence process focuses on a variety of issues, including the quality of management, the stage of development, the quality of cash flows and offtake contract counterparties, market growth expectations and volatility, competing projects in the geographic region, the experience of the sponsor in the sector and value creation opportunities, and the company’s valuation and capital structure. Significant third-party diligence is conducted and reviewed, typically including, market studies, environmental, legal, and quality of the engineering/construction firm, among other diligence.

The underwriting and diligence processes culminate with written material and a verbal presentation to the Sector Investment Committee in a formal investment approval session. The Sector Investment Committee is a forum for a robust discussion of the merits and risks of a proposed investment.

#### **Risks**

IET investments are subject to the following primary risks, which are assumed in varying degrees based on the investment profile:

- **Technology Risk** – The risk of scaling newer technologies that have been proven but not fully rolled out to the broader market.
  - Constructing a renewable power generation plant on time and on budget can be challenging, as labor and supply chain issues can cause cascading effects.
  - Producing a commodity at commercial scale and delivering to customers under varying conditions may present different challenges than those faced during the demonstration or pilot stages.
- **Market/Merchant Risk** – The financial risk posed by unhedged/uncontracted revenues and expenses.
  - Even when using derivatives for hedging purposes, the risk associated with derivatives may be highly volatile and the acquisition or disposition of derivatives involves leveraged risk.
  - Energy related infrastructure may experience volatile cycles, where specific market conditions may result in temporary or longer-term reductions in the value of an asset.

- Some investments can face substantial risk due to market price fluctuations, potentially impacting the company's ability to fulfill obligations and expected investment returns.
- Regulatory Risk – The risk that a change in regulations or legislation negatively impacts the business.
  - Global economic and political climates can be uncertain, and policy changes may lead to project delays, additional expenditures, or decreased revenues.
  - Assets may depend on permitting or licensing processes which can be affected by changing regulatory regimes.
  - Certain investments in the sectors where the IET Group focuses are incentivized by tax credits, grants, and loans that may fluctuate with legislative priorities.
- Counterparty Risk – The risk that a counterparty does not fulfill its contractual obligations.
  - Private equity investments are subject to the risk that a bank, broker, lender, power purchaser or other counterparty fails to perform its obligations.
  - Certain companies seek to mitigate counterparty risk through Power Purchase Agreements (“PPAs”), where the counterparty pays a fixed price for generated energy regardless of market power pricing. However, there is no guarantee that such PPAs will be available to a company under favorable terms.
- Single Asset Risk – Lack of diversification and risks stemming from exposure to a single market.
  - Assets may be negatively affected by site-specific factors such as weather, energy price volatility, or changing regulations.
  - Individual assets may be exposed to a higher degree of volatility due to these factors than a diversified portfolio of assets.
- Development Risk – Risks related to permitting, site control, and asset construction.
  - Certain investments may engage in large construction projects that involve numerous risks including shortages and delays in securing necessary equipment, materials, and labor, as well as weather interference.
  - Reliable road, power, and water supplies are often essential for project development and the availability and cost of these utilities/infrastructure alter capital and operating costs.
  - Some investments are directly or indirectly dependent on the operation/performance of third-party entities in the supply chain where financial sponsors have little influence or control.
- Operational Risk – Risk of asset mismanagement or other vulnerabilities, which can result in underperformance.
  - Despite proper development and operation, infrastructure may be vulnerable to force majeure events, with damage negatively affecting the company's ability to fulfill its obligations and impacting returns.
  - The operation and maintenance of infrastructure assets involves operational risks including issues related to labor, technology, demographic changes, parts availability and supply chain issues.

### **Private Equity (Funds and Equity Co-Investments)**

#### **Methods of Analysis**

The Private Equity Group participates in the private equity market through a variety of strategies. The primary strategies consist of the following: (i) investing in domestic lower middle market private equity buyout funds; (ii) investing in private equity funds that offer diversification and attractive return expectations, outside of the lower middle market; and (iii) investing in equity co-investments, alongside of a fund, in their portfolio company.

The Private Equity Group's core strategy is to invest in lower middle market or middle market United States focused buyout funds. The Group seeks fund managers with sector domain expertise, differentiated and repeatable investment strategies, demonstrated ability to create portfolio company value, and a history of generating strong returns with strong team continuity. The underwriting process typically begins with a manager presenting to members of the Private Equity Group. If warranted, a smaller team will conduct on-

site due diligence where the fund's strategy, team, operations and back office, performance and pipeline are analyzed. Significant time is spent underwriting the performance and prospects of the unrealized portfolio, the drivers of past performance, as well as lessons learned from underperforming investments. Extensive reference checks are typically conducted on the fund and partners. In addition, select fund strategies outside of the Group's core middle market strategy can be pursued for their return, diversification or risk mitigating characteristics.

In the case of direct equity investments, the diligence process focuses on a variety of issues, including the quality of management, the historical and projected financial performance of the business, the volatility of the industry and the company's cash flows, the competitive positioning of the target businesses, the strength of the sponsor and value creation opportunities, and the company's valuation and capital structure. Significant third-party diligence is conducted and reviewed, typically including background checks, market studies, quality of earnings, environmental, legal, and information technology, among other diligence.

The underwriting and diligence processes culminate with written material and a verbal presentation to the Sector Investment Committee in a formal investment approval session. The Sector Investment Committee is a forum for a robust discussion of the merits and risks of a proposed investment.

## Risks

Private Equity investments are subject to the following primary risks:

- General Risks
  - Companies in which HIMCO makes private equity investments are generally lower middle market and middle market companies that are not candidates for the public markets. These companies are often smaller businesses with less developed management teams and fewer financial resources than public companies and thus could pose greater risk to the investor than equity investments in public companies.
  - HIMCO's private equity investments will generally be highly illiquid investments.
  - Investments in securities of certain companies that have substantial amounts of indebtedness involve a high degree of risk. Companies with substantial amounts of indebtedness are inherently more sensitive to adverse business or financial developments or economic factors, including declines in company revenues, increases in company expenses, rising interest rates, downturns in the economy, increasing competition and deteriorating industry conditions. There can be no assurance that a company will generate sufficient cash flow to service its debt obligations or provide a return on equity capital.
- Risks Associated with Private Equity Fund Investments
  - The success of HIMCO's private equity fund investments depends significantly upon the ability of the funds and their investment advisors to identify attractive investment opportunities, provide high quality deal flow to the funds, add value to improve performance and successfully exit these investments.
  - Investors in private equity funds do not participate in the funds' day-to-day operations, including investment and disposition decisions. In order to safeguard their limited liability from the liabilities and obligations of the private investment funds in which they invest, investors must rely entirely on the general partner to manage the affairs of the funds.
  - While HIMCO actively monitors the portfolio company investments in a private equity fund, the management team of each underlying portfolio company is primarily responsible for handling its day-to-day operations, and HIMCO does not have the right to intervene unless HIMCO also has a direct co-investment in the portfolio company and only under certain limited circumstances. As a result, the success of HIMCO's private equity fund investments is reliant on the private equity fund's management and the management and board of directors of the underlying portfolio companies.
  - Private equity funds in which HIMCO invests participate in a limited number of investments (generally in the 10-12 company range) and, as a result, the unfavorable performance of a few investments could have a significant adverse effect on the performance of a particular fund.

- Distributions from portfolio companies to private equity funds are available only after satisfaction of claims of senior and subordinated creditors and any other securities senior to the equity securities purchased. Therefore, if a portfolio company of a fund in which HIMCO invests does not generate adequate cash flow to service its debt obligations, HIMCO's investment in such fund will suffer a partial or total loss of invested capital.
- Risks Associated with Direct Private Equity Investments (Equity Co-Investments and Legacy Subordinated Debt Positions)
  - Investors in subordinated debt and equity co-investments do not participate in the day-to-day operations of the issuing company. In order to safeguard their limited liability from the liabilities and obligations of the issuing company in which they invest, investors must rely on the private equity fund's management and the management of such company to manage its affairs.
  - While HIMCO actively monitors its private equity investments, the private equity fund's management and the management team of the issuing company is primarily responsible for handling its day-to-day operations, and HIMCO generally does not have the right to intervene with the exception of certain limited circumstances. As a result, HIMCO's private equity investments are reliant on the private equity fund's management and the management and board of directors of such issuing companies, which may include representation of other unaffiliated investors whose interests conflict with HIMCO's.
  - Distributions to direct equity holders are available only after satisfaction of claims of senior and subordinated creditors and any other securities senior to the equity securities purchased. Therefore, if a company in which HIMCO has a direct equity co-investment does not generate adequate cash flow to service its debt obligations, HIMCO's investment in that company's equity securities will suffer a partial or total loss of invested capital.
  - Subordinated debt securities typically are subordinated to senior debt, all or a significant portion of which may be secured. As a result, distributions to subordinated holders are available only after all senior creditors' claims have been satisfied.
  - If a company in which HIMCO has a subordinated debt investment becomes insolvent or files for bankruptcy protection, there is a risk of equitable subordination of HIMCO's investment to other creditors, or a court requiring investors to return amounts previously paid to it by such company. An investor's exercise of management rights in such company may also lead creditors of the company or other parties to assert claims against the investor.
  - Investment alongside third parties involves risks, including (i) the possibility that a third party investor has economic or business interests that are inconsistent with HIMCO's; (ii) that a third party investor is in a position to take (or prevent) actions in a manner contrary to HIMCO's investment objectives; and (iii) the possibility that a third party investor fails to make its capital contributions when due which could cause injury to the other investors and require the other investors to make additional capital contributions to cover the shortfall.
  - The risk that results from the financial structure of an investment and the rights that the structure provides to participants/investors. Many private investments are structured investments, which may be issued in multiple tranches that offer investors various maturity and credit risk characteristics. In addition, some are subordinated investments (in right of payment and/or security), which may be characterized by greater credit risks than those associated with the senior obligations of the same issuer or structurally senior obligations of a subsidiary issuer. Adverse changes in the financial condition of an issuer, general economic conditions, or both may impair the ability of such an issuer to make payment on subordinated securities and result in defaults on such securities more quickly than in the case of the senior obligations of such issuer. Different classes or tranches of debt could have different covenant packages. Holders of subordinated debt generally are not entitled to receive payment in bankruptcy or liquidation until senior creditors are paid in full. Further, remedies available to holders of subordinated debt are normally limited by restrictions benefiting senior creditors.

## **Private Placement Debt**

### **Methods of Analysis**

HIMCO employs a fundamentally driven, research-intensive investment process to manage private placement investments. Private placement analysts, traders, and portfolio managers work under the direction of the Head of Private Placements, who is ultimately responsible for strategy recommendations and performance within the sector. Private placement analysts incorporate a holistic review of an issuer's industry and competitive position, business strategy, operating profile, financial condition, and management. Financial analysis includes a detailed review of historical and projected metrics, including (but not limited to) revenue and profitability, financial and operating leverage, liquidity, and asset valuations (book and market). Particular emphasis is placed on each issuer's cash flow profile and outlook (generation and utilization). Private placement analysts also conduct structural analysis by reviewing bond indentures, note purchase agreements, other legal documents and private placement memoranda that are relevant to a particular investment opportunity. This aspect of the analysis process is done in collaboration with HIMCO's legal team (where appropriate) and it enables HIMCO to identify specific characteristics including the level of covenant protection, and security-level relationships within an issuer's capital structure. As part of the process of assessing an investment opportunity, private placement analysts typically seek public market information from public fixed income traders to obtain a perspective concerning current market conditions and trading levels of public market comparable securities. The analyst may also seek information on the industry from public research analysts. The process culminates with written material and a verbal presentation to the Sector Investment Committee in a formal investment approval session. The Sector Investment Committee is a forum for a robust discussion of the merits and risks of a proposed private placement investment. This investment process provides the Private Placement Group with a consistent framework for determining relative value, risk, and performance potential across industries, issuers, and securities.

### **Risks**

Please refer to the risks outlined above for [\*\*fixed income investments\*\*](#) as they also apply to private placement investments.

## DERIVATIVES

### Methods of Analysis

Derivatives are financial contracts whose value depends on, or is derived from, the value of an underlying asset, reference rate or index. Depending on the type of account, governing account documents (including, without limitation, investment guidelines), and regulatory constraints, derivative transactions may or may not be appropriate for a given client. HIMCO generally uses derivatives as part of a broader investment strategy and designs each derivative transaction to meet a specific client need or address a specific risk related to a given security or a portfolio. Generally, HIMCO uses derivatives for the following purposes:

- Hedging – Using a derivative to reduce or control exposure to certain risks, such as currency risk, credit risk, or interest rate risk. Hedging seeks to offset the risk of adverse price movements in the market.
- Replication – Using a derivative or combination of derivatives alone or in conjunction with other investments to replicate the investment characteristic of another investment. In certain circumstances, replication transactions can provide a more cost-effective means of investing in a given asset, in effect, by synthetically replicating the characteristics and performance of the asset.

HIMCO has a Derivatives Working Group that serves as a forum to discuss ongoing and new uses for derivatives, initiatives impacting derivative usage, and emerging issues with respect to derivatives.

### Risks

Derivatives involve significant risks and can be volatile. Derivatives are subject to the following primary risks:

- Counterparty Risk - The risk that the counterparty to a derivatives contract is unable or unwilling to honor its obligations under the contract. This risk is mitigated, to a degree, due to the exchange of collateral and the use of cleared derivatives, as well as certain counterparty risk mitigation processes in place at HIMCO.
- Credit Risk - The risk that the issuer of a security will not be able to make timely principal and interest payments. Changes in an issuer's credit rating or the market's perception of the issuer's creditworthiness can affect the value of any derivative exposure to that issuer.
- Currency Risk - The risk that changes in the exchange rate between currencies will adversely affect the value of a derivative contract.
- Hedging Risk - Hedging is a strategy that uses a derivative to offset the risks associated with another security. While hedging can reduce losses it can also reduce or eliminate gains or create losses if the market moves in a manner different than that anticipated by HIMCO or if the cost of the derivative outweighs the benefit of the hedge. HIMCO is not required to hedge and may choose not to do so.
- Index Risk - The risk that if the derivative is linked to the performance of an index, it will be subject to the risks associated with changes in that index. If the index changes, the portfolio could receive lower interest payments or experience a reduction in the value of the derivative to below what the portfolio paid. Certain indexed securities, including inverse securities (which move in an opposite direction to the index), create leverage, to the extent that they increase or decrease in value at a rate that is a multiple of the changes in the applicable index.
- Leverage Risk - The risk that relatively small market movements will result in large changes in the value of the derivative. Certain investments that involve leverage can result in losses that greatly exceed the amount originally invested.
- Liquidity and Valuation Risk - The potential lack of a liquid secondary market for derivatives could result in being unable to sell or close a derivatives position at the time or price desired thereby resulting in losses. The lack of a liquid secondary market for derivatives could also make derivatives more difficult to value accurately. Valuation of derivatives is more difficult in times of market turmoil

when many investors and market makers are reluctant to transact in complex instruments or publish prices for them.

- Volatility Risk - Use of derivatives in an account may increase its volatility. Volatility is the characteristic of a security, an index or a market to undergo significant price fluctuations within a short period of time. Such fluctuations in value of derivatives may not correlate perfectly with the overall securities market.

## OTHER GENERAL RISKS

Investment Adviser Cybersecurity Risk - As with any entity that conducts business through electronic means in the modern marketplace, HIMCO is exposed to potential risks resulting from cyber-attacks and data loss incidents (collectively, "cyber-events"). Cyber-events include but are not limited to:

- Illegally accessing or corrupting data maintained online or digitally;
- Denial of service attacks on websites;
- Unauthorized monitoring, release, misuse, loss, destruction or corruption of confidential information;
- Malicious restriction of access such as through ransomware;
- Infection from computer viruses or other malicious software code;
- Unauthorized access to (or compromise of) relevant systems, networks or devices; and
- Operational disruption or failures in physical infrastructure or operating systems.

Cyber-events affecting HIMCO or its service providers could result in disruptions to normal business operations (including the inability to trade, which could result in financial losses), destruction to equipment and systems, violations of applicable privacy and other laws, regulatory fines, reputational damage, and/or reimbursement or other compensation costs. HIMCO incurs costs for cybersecurity risk management. Such costs are ongoing as cybersecurity threats are constantly evolving as cyber attackers become more sophisticated and their techniques become more complex. Similar types of cybersecurity risks are also present for issuers of securities in which HIMCO invests for its clients. Cyber-events impacting issuers can result in material adverse consequences for such issuers including causing investments in such companies to lose value.

In addition to leveraging the resources and support of The Hartford's robust enterprise-wide information protection program, HIMCO maintains its own Cybersecurity, Privacy and Identity Theft Prevention Policy and Procedures ("Cybersecurity Policy"). The Cybersecurity Policy details HIMCO's cybersecurity, privacy and information protection program and the controls and risk management protocols that are tailored to address the cybersecurity, privacy and information protection risks applicable to HIMCO's business, operations and client base.

As part of HIMCO's cybersecurity, privacy and information protection program, HIMCO has a Technology and Cybersecurity Committee ("TaCC") that fulfills the firm's cybersecurity oversight responsibilities. TaCC monitors cybersecurity matters related to client information, material non-public information and other sensitive information contained in HIMCO's systems, applications, networks and otherwise within the company; focuses on key factors such as access rights and controls, data loss prevention, vendor management, training and incident response. TaCC reports up to HIMCO's Governance Oversight Committee and its membership includes, among others, business representatives, HIMCO's functional Head of Technology, Chief Compliance Officer ("CCO"), Chief Legal Officer, and Chief Risk Officer. TaCC meetings also include non-voting invited guests, which include representation from the broader Hartford enterprise, such as representatives from The Hartford's Information Protection Program ("THIP") and Enterprise Risk Management ("ERM"). In addition, HIMCO partners with The Hartford's Chief Information Security Officer and participates in The Hartford's Privacy and Security Council with the CCO and a Compliance Director serving as Information Protection Managers. Likewise, as part of its governance responsibilities to monitor cybersecurity matters pertaining to HIMCO's technology and data, HIMCO's President and CCO also represent the firm on The Hartford's Executive Privacy and Security Council.

Economic and Trade Sanctions Related Risk

Government imposed economic and trade sanctions may prohibit HIMCO from engaging in investment transactions for client accounts in certain countries, specific sectors of certain countries, and/or with specific companies or could require reporting of certain transactions to government agencies. Sanctions and other similar measures could directly or indirectly limit or prevent HIMCO from buying or selling securities for a client account, significantly delay or prevent the settlement of securities transactions, and/or adversely impact an account's liquidity or performance. Should an existing investment become subject to sanctions, HIMCO may be required to reject payments due in connection with the investment, not be able to divest of the investment (including an underperforming asset), or have to dispose of the investment at a price that is less than it would have received had it been sold at a different time or under different circumstances.

**ITEM 9: DISCIPLINARY INFORMATION**

**A. Criminal or Civil Proceedings**

None

**B. Administrative Proceedings Before Regulatory Authorities**

None

**C. Self-Regulatory Organization (SRO) Proceedings**

None

## **ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### **A. Broker-Dealer Registration Status**

HIMCO is not a registered broker-dealer.

### **B. Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Adviser Registration Status**

HIMCO has been registered with the Commodity Futures Trading Commission ("CFTC") as a Commodity Trading Adviser ("CTA") since February 19, 2009, and as a Commodity Pool Operator ("CPO") since January 1, 2013. Certain of HIMCO's management persons are registered as an associated person and/or principal of HIMCO (as the CPO/CTA).

### **C. Material Relationships or Arrangements with Affiliated Industry Participants**

HIMCO has relationships or arrangements material to its advisory business and/or its advisory clients with the following affiliated industry participants.

- Insurance companies and insurance agencies***

HIMCO is an investment manager for certain affiliated insurance companies including First State Insurance Company, Hartford Accident and Indemnity Company, Hartford Casualty Insurance Company, Hartford Fire Insurance Company, Hartford Insurance Company of Illinois, Hartford Insurance Company of the Midwest, Hartford Insurance Company of the Southeast, Hartford Life and Accident Insurance Company, Hartford Lloyds Insurance Company, Hartford Underwriters Insurance Company, Heritage Reinsurance Company, Ltd., Maxum Casualty Insurance Company, Maxum Indemnity Company, Navigators Insurance Company, Navigators Specialty Insurance Company, New England Insurance Company, New England Reinsurance Corporation, New Ocean Insurance Company, Ltd., Nutmeg Insurance Company, Pacific Insurance Company, Limited, Property and Casualty Insurance Company of Hartford, Sentinel Insurance Company, Ltd., Trumbull Insurance Company, and Twin City Fire Insurance Company. Through its affiliation with The Hartford, HIMCO is also affiliated with other insurance companies and insurance agencies, but HIMCO's relationship with such other affiliates is not material to its advisory business or clients.

HIMCO is a wholly owned subsidiary of The Hartford and, as noted above, HIMCO manages assets for a number of its affiliated entities. In addition, certain HIMCO employees (including HIMCO's President) serve in multiple roles both at HIMCO and across the broader Hartford enterprise. There are certain conflicts of interest inherent to such arrangements including, without limitation: (i) the incentive for HIMCO to favor affiliated clients when allocating investment opportunities (see [Item 6](#) for additional information); (ii) the potential for an employee to improperly benefit themselves (or others) in one HIMCO role by engaging in certain acts as part of another HIMCO role; (iii) the potential for a HIMCO employee to allow HIMCO's interests to influence their judgment when serving in an enterprise role; (iv) the potential for a HIMCO employee to allow The Hartford's interests to influence their judgment when serving in their HIMCO role; and (v) the potential for information received while acting in an enterprise role to restrict HIMCO's ability to trade in certain issuers for its affiliated and unaffiliated clients (as discussed in greater detail in [Item 11](#)). Such conflicts are primarily mitigated through the controls imposed by HIMCO's policies and procedures, including the Trade Allocation Policy and Procedures, Code of Ethics and Material Non-Public Information and Insider Trading Policy and Procedures as discussed in [Item 6](#) and [Item 11](#).

Portfolio managers at HIMCO manage portfolios for multiple clients and in doing so make investment decisions for each client based on the investment objectives, strategies, risk tolerance, practices and other relevant investment considerations applicable to that client. Consequently, portfolio managers can: (i) purchase or sell securities for one client and not another; (ii) purchase or sell the same security

for different clients at different times; (iii) place transactions on behalf of one client that are directly or indirectly contrary to investment decisions made on behalf of other clients; or (iv) make investment decisions for one client that are similar to those made for other clients, all of which have the potential to positively or negatively impact one client and not another, depending on market conditions. Accordingly, investment transactions by one or more HIMCO clients could have the effect of diluting or otherwise negatively impacting the values, prices or investment strategies of other HIMCO clients, particularly (but not necessarily limited to) those in less liquid strategies. Please see additional disclosure under [Item 6](#).

HIMCO is not obligated to transact (or refrain from transacting) in any security that HIMCO, its affiliates or their respective access persons transact in for their own account or for the accounts of any other client. In addition, HIMCO is not obligated to share with any client, information or investment strategies developed for or used in connection with other clients.

#### **D. Material Conflicts of Interest Relating to Sub-Advisers**

HIMCO both serves as a sub-adviser for other investment advisers and retains sub-advisers for its own clients. These relationships create conflicts of interest in that they can generate improper incentives as described below:

- In a dual sided sub-advisory relationship where HIMCO and another investment adviser serve as sub-advisers for each other's clients, a conflict arises in that HIMCO could be improperly incentivized to select or retain that investment adviser for reasons unrelated to its investment skill and expertise.
- In an arrangement where HIMCO serves as a sub-adviser for another investment adviser and that other adviser manages or sponsors private funds or other private investment vehicles, HIMCO could be improperly incentivized to invest in those vehicles for reasons other than the investment needs of its clients.

Such improper incentives can stem from, among other things, the income HIMCO receives from the other adviser for serving as its sub-adviser, potential access to, larger allocations of, or preferential pricing related to investments vehicles sponsored by the other adviser, or from the exchange of business-related gifts or entertainment associated with the relationship.

These conflicts are mitigated in the following ways:

- HIMCO conducts due diligence to evaluate potential sub-advisory relationships to determine whether the sub-adviser is appropriate to select or retain for a client;
- In a dual sided sub-advisory relationship, HIMCO has separate investment professionals assigned to oversee the mandates HIMCO's sub-advises out versus the mandates sub-advised to HIMCO. This separation of duties creates an independent feedback channel to management on the efficacy of the sub-advisory services being provided to HIMCO's clients (and vice versa);
- HIMCO's Gifts and Entertainment Policy and Procedures impose limits and restrictions on the receipt of gifts and entertainment in order to prevent gifts and entertainment from unduly and improperly influencing HIMCO's decision making and objectivity; and
- HIMCO's private asset classes engage in disciplined underwriting of investments and upon completion they present investments they want to pursue to the applicable Investment Committee for approval. The Investment Committee serves as a forum for robust discussion on the merits and risks of a proposed investment.

## **ITEM 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **Code of Ethics**

HIMCO has adopted a Code of Ethics (the “Code”) that applies to all of its supervised persons in accordance with applicable law. Supervised persons refers to all access, investment, and badge-only access persons, which includes all HIMCO employees, interns/externs and consultants that support HIMCO functions and have access to certain information, Hartford employees with roles requiring access to HIMCO floors, as well as others who are given this designation by Compliance. The Code is designed to make sure that supervised persons act in accordance with HIMCO’s fiduciary obligations to its clients. The Code requires that supervised persons conduct their personal securities transactions in a manner that does not abuse their position of trust and responsibility or impair their ability to carry out assigned duties. The Code prohibits supervised persons from using their position for private gain for themselves or any other person. Additional detail on some of the Code’s substantive requirements/controls is provided below.

Access and investment personnel are required to submit certain documentation to Compliance, including:

- Initial disclosure and annual affirmation of personal securities accounts in which they and certain family members that reside with them have an ownership interest or exercise investment discretion or control over;
- Initial disclosure and annual affirmation of securities holdings for certain accounts;
- Quarterly transaction reporting for certain accounts; and
- Pre-clearance of certain investments.

Some examples of personal trading restrictions and requirements imposed by the Code are as follows:

- Supervised persons in possession of material non-public information (“MNPI”) relating to securities or their issuer must not trade these securities for their related accounts or advise any person to buy or sell such securities, other than private side client accounts with respect to which MNPI was received, and only in accordance with any confidentiality or other contractual obligations;
- Prohibition on trading a security while having information about upcoming HIMCO trading activity for any client account;
- Prohibition on market manipulation such as market timing, front running or spreading of rumors or misinformation that supervised persons know (or suspect to be) inaccurate, false or misleading;
- Prohibition from trading securities on HIMCO’s MNPI restricted list;
- Sixty-day holding period requirement;
- Prohibitions on short sales;
- Prohibition on trading options on Hartford stock;
- Blackout period restrictions;
- Prohibitions on trading in initial public offerings, initial coin offerings, and special purpose acquisition companies;
- Requirement to maintain certain personal accounts with designated broker-dealers that send a transaction feed to HIMCO’s personal trading system for monitoring purposes; and
- Prohibition from engaging in excessive personal trading.

As part of managing conflicts of interest, such as allowing an outside business activity to improperly influence an employee’s work at HIMCO (or vice versa) or improperly consume their work time or HIMCO dedicated resources, the Code requires that all access and investment persons disclose and seek approval of their outside business activities, including those for which they receive compensation, as well as certain non-compensated roles.

HIMCO policies also contain controls designed to prevent supervised persons from making political contributions or providing gifts that have the actual or perceived effect of inappropriately influencing a government entity, official, or candidate.

A copy of the Code will be provided to any client or prospective client upon request.

### Participation or Interest in Client Transactions or Personal Trading

HIMCO transacts in securities for client accounts (including affiliated client accounts) in which it, its employees, and/or its related persons have a material financial interest. Such instances include without limitation: (i) transacting in a mutual fund sub-advised by HIMCO; (ii) transacting in the stock of The Hartford for portfolios that track an index in which The Hartford's stock is a component; and (iii) transacting in or recommending securities that could be held by employees in their personal accounts. These types of situations give rise to potential conflicts of interest because HIMCO's investment personnel have an incentive to engage in such transactions in client accounts for reasons unrelated to the client's mandate, including an economic interest in maximizing the performance of a security or an investment vehicle in which he or she is invested. HIMCO supervised persons also have an incentive to time their personal trades and/or HIMCO client trades in a way that maximizes their economic interest over the client's.

As part of its Code of Ethics and other Compliance policies HIMCO has implemented controls to mitigate the conflicts of interest described above. These controls include but are not limited to:

- Compliance restrictions in HIMCO's trade order management system that:
  - Prevent the purchase by HIMCO of The Hartford's stock in portfolios other than passive index portfolios that track an index in which The Hartford's stock is a component. In addition, Compliance monitors HIMCO's passive index portfolios to ensure that the percentage of The Hartford's stock in the portfolio remains aligned (within a range) to the percentage it represents in the applicable index.
  - Restrict HIMCO's purchase of HIMCO managed investment vehicles for unaffiliated HIMCO clients until the investment rationale can be discussed with Compliance.
- Various controls within the Code of Ethics that require:
  - Disclosure of specific types of personal securities accounts and the holdings therein;
  - Specific types of personal securities accounts be held at designated broker-dealers;
  - Preclearance of investments in specific types of securities, including but not limited to any HIMCO managed mutual fund and The Hartford stock;
  - Blackout restrictions for access persons and investment personnel. The Code of Ethics does exclude certain securities and trading in certain types of personal securities accounts from the blackout restrictions. These exclusions generally involve highly liquid securities and situations where the conflicts are otherwise mitigated (such as accounts over which investment personnel do not have discretion).

Additionally:

- HIMCO manages a large portfolio of securities for its affiliates which, in the ordinary course of business, could compete with HIMCO's unaffiliated clients in the market for securities. Please see [Item 6](#) for a discussion of the measures HIMCO uses to address the resulting conflicts of interest.
- HIMCO receives MNPI as part of investing for clients in various private asset classes. Receipt of MNPI creates certain conflicts of interest as follows:
  - Receipt of MNPI restricts HIMCO's ability to transact in (and/or otherwise advise clients on) the securities of issuers for whom the firm has MNPI. Thus, MNPI received while analyzing investments for certain client accounts will restrict HIMCO's ability to transact in certain securities for other client accounts.
  - Receipt of MNPI could provide supervised persons with an improper incentive to use the MNPI (or other confidential information) to benefit themselves (or their friends or family) to the detriment of HIMCO clients.

If HIMCO's personnel receive MNPI, subject to certain exceptions, the issuer of that security is placed on HIMCO's MNPI restricted list and public transactions in that issuer are restricted until the MNPI has been publicly disclosed or becomes stale. HIMCO's MNPI Policy and Procedures prohibit the dissemination of MNPI in violation of law and from engaging in insider trading either personally or on behalf of clients or others.

- Certain HIMCO personnel (including HIMCO's President) receive information related to transactions being considered by HIMCO's affiliates. Compliance tracks all such instances and has

controls in place to ring fence impacted personnel as appropriate. Compliance implements specific or firm-wide restrictions on personal and firm trading in affected issuers as necessary.

- Certain HIMCO personnel (including investment personnel) have family members that hold positions as directors or executive officers at public companies. HIMCO's Conflicts of Interest and Material Non-Public Information (MNPI) and Insider Trading Policies and Procedures require that such employees disclose this information to Compliance because it (i) presents a conflict of interest between the personal financial interests of such employees and those of HIMCO and its clients; and (ii) warrants the application of additional control(s). HIMCO has implemented controls through its MNPI and Insider Trading Policy and Procedures to mitigate this conflict and detect and prevent the misuse of MNPI. In addition, personnel with family members in these roles are also subject to the additional control of manual Compliance review of all personal trades in the specific public company in question.
- HIMCO's President is compensated to serve on the board of directors of a non-publicly traded company. As part of this role HIMCO's President could receive MNPI or encounter discussions or decision making that presents a conflict of interest with respect to HIMCO and its clients. In order to address these potential situations, HIMCO has established a number of compliance controls designed to mitigate the risk of the President's board service impacting HIMCO or its service to its clients. Despite these controls it is possible that the receipt of MNPI could cause HIMCO to have to restrict trading in the securities of certain issuers in client accounts.

#### Principal Transactions and Cross Trades

HIMCO engages in principal transactions and cross trades in accordance with, and only to the extent permitted by, applicable law. A cross trade is a trade effected by an investment adviser between two or more of its advisory clients' accounts. A principal transaction occurs when an investment adviser causes a client to engage in a transaction either with the adviser itself or with the adviser's affiliate(s). In HIMCO's case:

- A cross trade occurs when HIMCO effects a securities transaction between the accounts of two or more of its advisory clients.
- A principal transaction arises whenever the accounts of HIMCO affiliates are party to a cross trade (whether on one or both sides of the transaction).

While clients can benefit from cross trades and principal transactions by obtaining a more favorable price or access to a security, such transactions also create the potential for HIMCO to engage in self-dealing, price manipulation, the placing of unwanted securities in client accounts, or the movement of certain desirable securities to other client accounts. In addition, HIMCO has a conflict of interest where it represents advisory accounts on both sides of the transaction and at least one account is an affiliated account as HIMCO has an incentive to favor the affiliated client.

HIMCO's Cross Trade and Principal Transactions Policy and Procedures impose controls intended to address the conflicts of interest described above. Such controls include without limitation:

- Required consultation with Compliance in advance of any principal transaction or cross trade
- A prohibition on engaging in agency cross trades and netted transactions
- Procedures that do not permit the processing of a principal transaction or cross trade by HIMCO's Operations Department without a completed consent form that has been signed by HIMCO and the clients involved. The consent form discloses the capacity in which HIMCO is acting, HIMCO's conflicts of interest, and the material terms of the transaction.
- Pricing controls for cross trades and principal transactions
- A prohibition on engaging in cross trades or principal transactions involving ERISA plan accounts
- Rule 17a-7 procedures that must be followed for any cross trade involving a mutual fund or other registered investment company
- A prohibition on engaging in principal transactions involving mutual funds or other registered investment companies
- Compliance surveillance controls

## **ITEM 12: BROKERAGE PRACTICES**

### **Best Execution**

As a SEC registered investment adviser, HIMCO has a duty to seek best execution when selecting counterparties to execute client trades. HIMCO fulfills this duty by seeking to execute transactions with the goal of maximizing value for the client under the particular circumstances occurring at the time of the transaction. Maximizing value encompasses more than just minimizing cost or maximizing proceeds. The determinative factor is whether the transaction represents the best qualitative execution.

HIMCO's traders evaluate each order to determine what markets, platforms, and/or counterparties offer the most favorable execution. Traders are not necessarily required to choose the counterparty offering the best price if, in their reasonable judgment, there is a material risk that the overall qualitative level of execution provided by such counterparty is less favorable than can be obtained elsewhere. Further, traders do not have to solicit competitive bids/offers for a particular transaction if in their judgment doing so will harm the overall quality of execution.

In selecting counterparties to execute a trade, HIMCO's traders consider the following factors (as applicable) when making the best execution determination. Different factors will have varying levels of importance for each transaction, as each transaction is unique:

- Ability to access other markets, and the cost/difficulty associated with achieving such access
- Ability to limit market impact
- Availability of accurate information to assess execution quality
- Counterparty generated or provided research
- Counterparty's ability and willingness to commit capital
- Counterparty's block trading and arbitrage capabilities
- Counterparty's overall responsiveness and willingness to work with HIMCO
- Counterparty's participation in a given offering or underwriting
- Counterparty's reputation, integrity and execution quality
- Counterparty's track record for errors and its willingness to correct errors for which it was at fault
- Execution speed relative to other markets
- Level of anonymity available through a particular counterparty
- Liquidity of the market for the security in question
- Price (including commission rates or spreads)
- Security characteristics
- Size and difficulty of the order

In addition, trades must be executed with counterparties that are on HIMCO's list of approved counterparties.

When multiple bids/offers are sought to sell/buy a security, there are times when certain qualitative factors will cause HIMCO to accept a different price than initially executed. In these situations, HIMCO's traders must be comfortable that taking the adjusted price is consistent with long term best execution and that the winning price is still better than the cover price.

HIMCO encounters situations (typically when funding, repositioning, or liquidating a client portfolio) where it is advisable to trade an entire portfolio or a list of securities, as opposed to buying or selling each security individually. The objective of trading in this fashion is to minimize the amount of market risk taken by the client. Such trading can, however, involve a liquidity premium. HIMCO permits trading in this fashion provided it involves a single client account (not permitted for pools or other commingled investment vehicles), the portfolio manager believes trading in the aggregate is beneficial to the client, and the trader is comfortable that the pricing level as a whole (as opposed to security by security) is consistent with best execution.

HIMCO's relationships with counterparties are complex, particularly with those counterparties that are affiliated with large financial institutions. For certain counterparties, in addition to its trading relationship, HIMCO also has other relationships, including without limitation:

- Investing client assets in securities issued by counterparties or their affiliates;
- Utilizing such counterparties or their affiliates as counterparties for derivatives transactions; and
- Acting as a sub-adviser for such counterparties or their affiliates.

HIMCO is mindful of the potential conflicts of interest that arise from these complex relationships, such as the potential for trades to be directed to certain counterparties for inappropriate reasons or the potential of certain gifts, entertainment, or donations to give the appearance of undue influence. Accordingly, HIMCO has implemented a number of controls to mitigate such conflicts, including without limitation:

- Pursuant to HIMCO's Best Execution Policy and Procedures:
  - Trades may not be directed to a counterparty in return for: (i) error corrections; (ii) suggested preferential treatment in new issues, equity initial public offerings (IPOs), or other offerings; (iii) gifts and/or entertainment; or (iv) client referrals.
  - Investment personnel must not be influenced by any personal conflicts of interest, such as having a family member or close personal friend who works for or is affiliated with a counterparty. The existence of any such relationship must be disclosed to Compliance and the Head of Trading.
- HIMCO's Prohibited Brokerage Arrangements Policy and Procedures and Best Execution Policy and Procedures prohibit HIMCO from executing transactions on behalf of its advisory clients through affiliated counterparties.
- HIMCO's Gifts and Business Entertainment Policy and Procedures:
  - Impose limits on and surveillance around the receipt of gifts and entertainment; and
  - Impose limits on donations made by a business partner in a HIMCO employee's name (or vice versa) and requires disclosure of such donations to Compliance.

### **Soft Dollars**

Counterparties often provide products and services to investment advisers in order to give the adviser additional incentives to direct client brokerage transactions to the counterparty. These arrangements are often referred to as "soft dollar" arrangements. The SEC defines soft dollar practices as arrangements under which products or services other than execution of securities transactions ("soft dollar benefits") are obtained by an adviser from or through a counterparty in exchange for the direction of client brokerage transactions to the counterparty. In addition, advisers also receive products and services that are provided on a "bundled" basis with trade execution. Even if an adviser does not pay a separately identifiable fee for the "bundled" products and services, the receipt of these items could potentially be characterized as soft dollar benefits.

When HIMCO obtains soft dollar benefits, it receives a benefit because it does not need to produce or pay for the research, products or services itself. Moreover, HIMCO generally does not limit the application of soft dollar benefits to the client accounts whose commissions paid for the benefits. Additionally, when transactions involving soft dollars involve paying higher commission rates (sometimes referred to as "paying up"), HIMCO faces a conflict of interest between the desire to obtain the soft dollar benefits and its obligation to seek best execution for its clients. As such, HIMCO's receipt of soft dollar benefits creates the incentive for HIMCO to: (i) disregard its best execution obligations when executing transactions (in order to obtain research, products or services); and (ii) trade client securities inappropriately in order to generate soft dollar benefits. HIMCO has adopted and implemented a number of policies and procedures that it believes address this conflict:

- HIMCO's Soft Dollar Policy and Procedures impose limitations on the soft dollar arrangements that HIMCO enters into and the types of soft dollar benefits that can be utilized.
- HIMCO's Best Execution Policy and Procedures impose a number of controls designed to monitor HIMCO's compliance with its best execution responsibilities.

- HIMCO's Gift and Business Entertainment Policy and Procedures impose limits on and surveillance around the receipt of gifts and entertainment.

#### Commission Sharing Arrangements ("CSAs")

Other than Commission Sharing Arrangements ("CSAs") approved by HIMCO's Brokerage Review Committee, HIMCO's investment personnel are prohibited from entering into formal soft dollar arrangements on HIMCO's behalf. HIMCO does not have any CSAs in place as of the date of this brochure.

#### Use of Bundled Products and Services

HIMCO receives products and services that are provided on a "bundled" basis with trade execution from some of its approved counterparties ("Bundled Products and Services"). So long as they are proprietary in nature (i.e. are produced by the counterparty providing them and not by a third-party), then HIMCO's investment personnel are permitted to utilize Bundled Products and Services.

HIMCO's investment personnel are not permitted to accept Bundled Products and Services from a counterparty if those Bundled Products and Services are produced by an entity other than such counterparty ("Third Party Bundled Products and Services") unless:

- Such Third Party Bundled Products and Services are obtained through a CSA that has been approved by HIMCO's Brokerage Review Committee; or
- Such Third Party Bundled Products and Services have been disclosed to and pre-approved by the Chief Compliance Officer and the Chief Legal Officer (or their respective designees).

During 2024, HIMCO received Bundled Products and Services from approved counterparties, which include, without limitation, access to: (i) research reports; (ii) research analysts; (iii) issuer management; (iv) algorithmic trading software; (iv) execution related communication and connectivity services; (v) analytical tools (such as modeling tools); (vi) data and analytics; (vii) research websites; (viii) advice on order execution; (ix) on-site and virtual research presentations; and (x) seminars and conferences.

#### Brokerage for Client Referrals

HIMCO's Best Execution Policy and Procedures and Prohibited Brokerage Arrangements Policy and Procedures prohibit staff from directing trades to a counterparty in return for client referrals.

#### Client Directed Brokerage

A client directed brokerage arrangement is an arrangement whereby the client directs its investment adviser to execute some or all of the client's transactions with one or more specific counterparties. Client directed brokerage arrangements can take numerous forms, including without limitation: (i) written direction from the client directing the investment adviser to use particular counterparties to execute their securities transactions; (ii) statutory mandates in certain jurisdiction(s) that require investment advisers to use best efforts to direct securities transactions for particular accounts domiciled in that jurisdiction to a specific type of counterparty; and (iii) client requests that investment advisers direct a certain portion of trades for their accounts to counterparties owned by minorities, women, veterans and other groups.

HIMCO will consider transacting through counterparties identified by the client if the client submits their request in writing and certain conditions are met. HIMCO advises clients making such a request that directed brokerage can result in disadvantages, including but not limited to:

- Higher transaction costs for the client stemming from, among other things, missing out on any savings that HIMCO obtains through negotiating volume discounts on aggregated transactions;
- A reduction in HIMCO's flexibility in securing best execution;
- Inability to participate in a new issue if that new issue is provided by another counterparty; and
- Account(s) not generating returns equal to clients that do not direct brokerage.

HIMCO will not direct trades to counterparties as compensation for, or in recognition of, any promotion or sale of shares of or interests in HIMCO managed mutual funds, private funds, or separately managed accounts.

### **Aggregated Orders and Trade Allocation**

HIMCO, in its discretion, aggregates orders (absent specific client direction to the contrary) when it determines that it is consistent with best execution and in the best interests of its clients. When a decision is made to aggregate orders on behalf of more than one account, such transactions must be allocated in a fair and equitable manner. Aggregated trades can be used to facilitate best execution including negotiating more favorable prices, obtaining more timely or equitable execution, or reducing overall transactions costs. HIMCO affiliated accounts are permitted to be included in aggregated trades.

To mitigate conflicts of interest such as favoring certain clients over others when it comes to trade aggregation and allocation, HIMCO's Trade Allocation Policy and Procedures require HIMCO portfolio managers to prepare a written allocation statement specifying the participating client accounts and how the order is intended to be allocated before the trade is executed. However, there are times when an order and its execution occur simultaneously and requiring pre-trade documentation may prevent participation by interested parties. In those instances, the written allocation statement must be entered by the portfolio manager shortly after the transaction is completed. If the order is filled in its entirety it is allocated to client accounts in accordance with the allocation statement. If the order cannot be filled in its entirety, the order is allocated according to the pro rata algorithm of HIMCO's trade order management system based on the written allocation statement. There are a number of documented exceptions to the pro rata methodology described above. Such exceptions include, without limitation:

- Where applying the pro rata algorithm would result in accounts being left with amounts that are below the minimum trade size for the security being traded. In this situation the Trade Allocation Policy and Procedures require that investment personnel follow a specific alternative allocation process.
- Situations where investment personnel determine a pro rata allocation is not appropriate or otherwise request an exception (subject to the prior approval of certain members of senior management (the Chief Compliance Officer (or designee) and another senior leader, collectively "Designated Executives").
- HIMCO's alternative asset classes have alternative allocation policies which incorporate nuances of their individual markets and utilize different allocation methodologies than the pro rata algorithm. More information on these alternate methodologies is available upon request to HIMCO clients that invest in alternative asset classes and prospective clients interested in an alternative asset mandate.

Once trades are executed, they are only reallocated in limited circumstances and, except for certain documented exceptions set out in the Trade Allocation Policy and Procedures, only upon the review and approval of the Designated Executives. Clients with multiple portfolios may provide authorization for HIMCO to reallocate trades between their portfolios prior to settlement.

In certain alternative asset classes a number of unaffiliated HIMCO clients require co-investment alongside at least one HIMCO affiliate. In those circumstances HIMCO affiliates generally need to receive an allocation in order for the unaffiliated client to receive an allocation (unless the HIMCO affiliate already has exposure to the issuer).

For information on allocation related conflicts of interest please refer to [Item 6](#) and [Item 10](#).

### **Trade Errors**

It is HIMCO's policy to treat its clients fairly and equitably. In accordance with its Trade Error Correction Policy and Procedures, HIMCO will assess and determine when a trade error has occurred. For trade errors involving bundled or package trades that result in both realized gains and losses for a client, subject to

certain exceptions, HIMCO nets the realized gains and losses on a client-by-client basis as appropriate and reimburses net losses in a timely manner (except for certain affiliated clients). For trade errors where the corrective action results in a realized gain for a client, the client retains the gain. For trade errors where the corrective action results in a realized loss for a client, HIMCO reimburses the client for the loss incurred (except for certain affiliated clients) in a timely manner. The amount and methodology used to calculate reimbursements are based on a variety of factors including, but not limited to, benchmarks and other market factors. Pursuant to HIMCO's Trade Error Correction Policy and Procedures all trade errors must be reported and documented as soon as practicable after discovery of the error and, if necessary, corrective action must be taken in a timely and prudent manner.

## **ITEM 13: REVIEW OF ACCOUNTS**

### **Review of Client Accounts**

Each client account is assigned to one or more portfolio managers who are responsible for ensuring that transactions and holdings are aligned with the account's investment mandate, objectives and risk tolerance, and comply with the account's investment guidelines and applicable regulatory requirements. Portfolio manager monitoring of client accounts occurs on an ongoing basis as they make investment decisions and evaluate investment opportunities for each account. External events impacting the account are also incorporated into this ongoing review and can include, but are not limited to:

- Changes to a client's investment mandate (such as modifications to investment guidelines, risk tolerance, and income or cash needs);
- Additions to or withdrawals from an account;
- The evolution of new security types in the marketplace; or
- Material market events impacting the account.

Compliance supports the portfolio managers' efforts by conducting periodic account reviews and performing ongoing surveillance activities to monitor and assess adherence to investment guidelines and applicable regulatory requirements:

- Compliance surveillance monitors whether transactions and holdings are appropriate for a particular portfolio (or group of portfolios) based upon the applicable investment guidelines and regulatory requirements. Surveillance occurs within HIMCO's trade order management system on both a pre-trade and post-trade basis and integrated tools provide timely notification to Compliance and Portfolio Management when an order, trade or holding approaches or breaches constraints imposed by the applicable investment guidelines or regulatory requirements. In addition automated post-trade surveillance is performed in HIMCO's internal investment platform for limits that are based on accounting values, and manual surveillance is used for constraints that cannot be tested effectively on an automated basis. Compliance is responsible for researching and determining the validity of each violation notification. If validated, Compliance documents the violation and notifies Portfolio Management and other internal stakeholders as appropriate. At the client's request, Compliance will produce compliance certifications on a stated frequency that include any validated violations.
- As part of new account set up and on an as-needed basis thereafter, Compliance reviews the account's controlling documents with Portfolio Management and other internal stakeholders, as appropriate, and codes applicable constraints into HIMCO's trade order management system or internal investment platform. Factors that can prompt Compliance to review a client account on an ad hoc basis include without limitation:
  - Changes to investment guidelines;
  - Regulatory changes that impact management of the account;
  - A trade error (to determine if a particular security was eligible for the account); and
  - Enhanced functionality in the trade order management system or internal investment platform.

### **Client Reporting**

Client reports can be tailored to meet the needs of the respective client, and vary in scope, format, approach and timing in accordance with each client's requirements, as well as the products, strategies and asset classes in which they invest. Typically, clients receive formal written reports on either a quarterly or monthly basis. These reports include various components as agreed upon by HIMCO and the client, including without limitation, absolute performance, benchmark-relative performance, income metrics, market commentary, portfolio commentary, contributions/withdrawals, credit losses/watch lists, portfolio characteristics (e.g. sector, quality, duration, maturity, etc.) and portfolio holdings. HIMCO has also implemented sustainability related reporting at the request of certain clients. Ad hoc reporting is also used to supplement formal reporting and can include components such as a performance snapshot, credit updates, and topical risk exposures.

## **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

### **A. Economic Benefits for Providing Services to Clients**

HIMCO receives economic benefits from persons who are not clients in connection with providing advisory services to its clients as follows: (i) through certain Bundled Products and Services described in [Item 12](#); and (ii) in the form of gifts and entertainment from counterparties through which HIMCO executes trades. These practices give rise to a conflict of interest by creating an incentive for HIMCO to disregard its best execution obligations when placing client trades. HIMCO has adopted and implemented a number of policies and procedures that it believes address this conflict:

- HIMCO's Gift and Business Entertainment Policy and Procedures impose limits on and surveillance around the receipt of gifts and entertainment.
- HIMCO's Soft Dollar Policy and Procedures impose limitations on the soft dollar arrangements that HIMCO enters into and the types of soft dollar benefits that are utilized.
- HIMCO's Best Execution Policy and Procedures impose a number of controls designed to monitor HIMCO's compliance with its best execution responsibilities.

### **B. Compensation to Non-Supervised Persons for Client Referrals**

As of the date of this Brochure, HIMCO does not pay non-supervised persons for client referrals. Should HIMCO decide to enter into an arrangement in the future whereby non-supervised persons are compensated for referring clients to HIMCO, such arrangements would be entered into in accordance with applicable law and internal policies, which among other things, requires appropriate disclosure to prospective clients. HIMCO's affiliates do retain and pay investment consulting organization(s) to provide services to other areas of The Hartford enterprise that oversee investments, some of which are managed by HIMCO. Such investment consultant(s) could, in the ordinary course of business, recommend HIMCO's services to their clients.

**ITEM 15: CUSTODY**

HIMCO does not have custody of client funds or securities.

#### **ITEM 16: INVESTMENT DISCRETION**

HIMCO accepts discretionary authority to manage advisory accounts on behalf of clients. Clients authorize HIMCO to manage advisory accounts on a discretionary basis through the written agreement applicable to the account. Such agreements include, without limitation, investment management agreements and sub-advisory agreements. In exercising its discretionary authority HIMCO is typically limited by client-imposed investment policies and guidelines that vary by client. In addition, HIMCO's discretionary authority over certain accounts is limited by various securities, tax, and other laws that, for example, require diversification of investments or impose other limitations.

As noted in [Item 4](#), HIMCO also furnishes advisory services to clients on a non-discretionary basis.

## **ITEM 17: VOTING CLIENT SECURITIES**

As a general matter, HIMCO votes proxies on behalf of advisory accounts for which it has voting discretion, including clients who have explicitly authorized HIMCO to vote proxies, as well as clients that have not expressly reserved proxy-voting responsibility for themselves or a designated third party.

### **Policies and Procedures**

HIMCO has written proxy voting policy and procedures in place as required by Advisers Act Rule 206(4)-6. HIMCO's Proxy Voting Policy and Procedures are designed to ensure that proxies are voted in the best interest of HIMCO's clients and to prevent conflicts of interest from improperly affecting the manner in which HIMCO votes its clients' proxies. The Proxy Voting Policy and Procedures include, among other things:

- Establishment of a Proxy Voting Committee;
- Utilization of an independent proxy voting advisory firm;
- Periodic reviews of the proxy voting guidelines used for HIMCO clients;
- Sampling of proxies with Report Feedback Statements;
- Controls to mitigate potential conflicts of interest related to proxy voting; and
- Compliance surveillance processes to monitor the votes cast by the independent proxy voting advisory firm for HIMCO clients.

### **Proxy Voting Committee**

HIMCO has established a Proxy Voting Committee that is charged with oversight of HIMCO's proxy voting practices. The Proxy Voting Committee is a multi-disciplinary committee that is primarily responsible for:

- Approving HIMCO's Proxy Voting Policy and Procedures;
- Approving the proxy voting guidelines that the independent proxy voting advisory firm uses to vote proxies for HIMCO's clients;
- Evaluating conflicts of interest related to specific proxy votes;
- Annually reviewing the overall performance of the independent proxy voting advisory firm; and
- Evaluating and making decisions with respect to recommendations made by HIMCO's Proxy Voting Working Group.

### **Use of an Independent Proxy Voting Advisory Firm**

HIMCO's portfolio managers invest in a diverse and substantial number of securities. To assist them in proxy voting and to prevent potential or actual HIMCO conflicts of interest from improperly impacting proxy voting, HIMCO has retained the research and automated voting services of an independent proxy voting advisory firm, Glass Lewis & Co, LLC ("Glass Lewis"). Glass Lewis is an established independent research firm that provides proxy advisory and automated voting services to institutional investors and investment advisers.

Glass Lewis's voting recommendations are accessible to HIMCO through Glass Lewis's web-based electronic voting platform ("ViewPoint"). Glass Lewis pre-populates votes for HIMCO clients based on the proxy voting guidelines that HIMCO's Proxy Voting Committee has approved for the strategy in which the client is invested. HIMCO has the ability to change the pre-populated votes at any time prior to vote submission through ViewPoint. Glass Lewis processes and submits the proxy votes on behalf of HIMCO clients in an automated fashion and provides operational, recordkeeping, and reporting services related to proxy voting for HIMCO clients.

As a general matter, all proxies are voted in accordance with the applicable set of Glass Lewis proxy voting guidelines that are determined by HIMCO's Proxy Voting Committee to be in the best interest of investors in a given HIMCO strategy unless a HIMCO portfolio manager objects (as described in greater detail below) or a client dictates otherwise. If a client would like to vote a proxy in a particular manner the client must submit their request in writing to their HIMCO Client Management representative. HIMCO will vote the proxy

in accordance with the client's written instructions, provided such instructions are received sufficiently in advance of the vote submission deadline.

#### Evaluation of Proxy Voting Guidelines

On at least an annual basis, the Proxy Voting Working Group (comprised of representatives from Equity Portfolio Management, Compliance and Investment Law) convenes to conduct a review of HIMCO's equity strategies to determine whether voting client proxies in accordance with certain proxy voting guidelines for the upcoming year is in the best interest of the clients in each equity strategy. The Proxy Voting Working Group notifies the Proxy Voting Committee of the outcome of this review at its annual meeting. If changes are recommended as a result of the review, the Proxy Voting Working Group provides its recommendations to the Proxy Voting Committee for review and approval. The Proxy Voting Working Group also conducts similar ad hoc reviews as necessary if new equity strategies are launched or existing equity strategies are materially modified.

#### Consideration of Additional Issuer Information

Situations do arise where an issuer provides additional information concerning a proxy matter after Glass Lewis has already issued its voting recommendation, but before the submission deadline. Glass Lewis makes its clients aware of additional issuer information through a report called the Report Feedback Statements ("RFS"). The RFS allows issuers to submit feedback about Glass Lewis analysis and have their comments reviewed by Glass Lewis and delivered to Glass Lewis's investor clients. When an issuer chooses to submit an RFS, Glass Lewis reviews the feedback and determines whether to change its proxy research and vote recommendations. Glass Lewis clients then receive the RFS as part of a reissued proxy research report along with an indication of whether the issuer's feedback caused Glass Lewis to revise its research/recommendations. Glass Lewis then casts the proxy vote on behalf of the impacted Client Accounts consistent with its final recommendation.

On a quarterly basis, HIMCO Compliance samples votes where an RFS has been issued (provided there are such votes within the relevant quarter). Compliance sends the sample of RFS's to Portfolio Management who reviews the votes in the sample to confirm that Glass Lewis:

- Appears to have considered the additional information in the RFS; and
- Voted the proxy consistent with how the Proxy Voting Guidelines approved for the relevant HIMCO strategy would suggest the proxy should be voted in light of the additional information.

Portfolio Management documents their analysis and provides it to Compliance for review. If any issues are identified Compliance promptly raises them to the Chief Compliance Officer.

#### Conflict Management Procedures

Glass Lewis has adopted and implemented Conflict of Interest Policies and Procedures that are intended to ensure that conflicts of interest do not impact the preparation of proxy voting recommendations. The current Conflict of Interest Policy and Procedures are posted and available for review on Glass Lewis's website ([https://www.glasslewis.com/due\\_diligence\\_resources/](https://www.glasslewis.com/due_diligence_resources/)). On an annual basis Compliance obtains the current Conflict of Interest Policy and Procedures, reviews them, and briefs the Proxy Voting Committee on any changes during its next regularly scheduled meeting.

While it is HIMCO's general policy to follow the proxy voting guidelines and recommendations of Glass Lewis, HIMCO retains the authority on any particular proxy to vote differently from the proxy voting guidelines or a related Glass Lewis recommendation. However, such decisions are subject to review and approval to ensure that the decision is not influenced by conflicts of interest. When a portfolio manager wishes to vote a proxy differently from the proxy voting guidelines or a Glass Lewis recommendation the portfolio manager must first notify HIMCO's Chief Compliance Officer (or designee) of such fact and provide a recommendation on how the proxy should be voted. The Chief Compliance Officer (or designee) must then conduct a conflicts investigation on behalf of the Proxy Voting Committee and report the findings to the Proxy Voting Committee.

- If the Proxy Voting Committee determines that no conflict of interest exists, the portfolio manager may vote the proxy as requested.
- If the Proxy Voting Committee determines that a conflict of interest exists, the portfolio manager is not permitted to vote the proxy as requested and must either vote the proxy in accordance with the Glass Lewis recommendation or contact the client to recommend that the client vote the proxy.

In situations where a proxy contains multiple proposals, the existence of a portfolio manager conflict of interest with respect to one proposal will not necessarily prevent the portfolio manager from voting on the other proposal(s) where a conflict of interest does not exist.

#### Compliance Surveillance

Compliance conducts multiple types of surveillance related to proxy voting including:

- Sampling proxy recommendations for which Glass Lewis has included a precautionary conflicts disclosure to confirm that the recommendation and resulting vote were cast consistent with the applicable proxy voting guidelines.
- Sampling pre-populated votes for HIMCO clients through ViewPoint to confirm that the proposed vote is consistent with the applicable proxy voting guidelines.
- Facilitating the sampling of RFS's and corresponding proxy votes.
- Reviewing the Glass Lewis voting summary report to identify votes contrary to the Glass Lewis recommendation to ensure certain processes in HIMCO's Proxy Voting Policy and Procedures were followed.

#### Refraining from Casting Proxy Votes

HIMCO or Glass Lewis (on behalf of HIMCO) could be prevented from casting a proxy vote or could decide not to cast a proxy vote under certain circumstances, such as:

- When the security associated with the proxy has been loaned out as part of a client's securities lending program;
- Situations where proxy materials are not delivered in a timely fashion;
- Situations where HIMCO does not have the requisite authority needed to cast the vote (e.g. where a formal power of attorney is required, and such formal power of attorney is not in place); or
- Situations where HIMCO determines that refraining from voting is in the best interest of the client.

When deciding if abstaining from a vote is in the best interest of the client, HIMCO's portfolio managers consider numerous factors such as the cost and benefit of casting the vote, the materiality of the client's position size, and whether there is sufficient information available to cast a well-informed vote.

HIMCO's Proxy Voting Policy and Procedures are available to clients upon request. Clients may also obtain information on how their proxies were voted by contacting their HIMCO Client Management representative. The proxy records for the registered investment company sub-advised by HIMCO are disclosed to shareholders via publicly available annual filings.

**ITEM 18: FINANCIAL INFORMATION****A. Prepayment of Client Fees**

Subject to the following exception, clients of HIMCO are not required to pre-pay investment advisory fees.

While individual circumstances can vary by client, HIMCO commercial mortgage loan only clients typically pay a portion of a month's worth of master servicing fees at each loan's closing to cover the partial month from loan closing to month end. The client sends the fee alongside their portion of the loan proceeds on the day of closing. For more information please refer to [Item 5.D.](#)

**B. Financial Conditions Likely to Impair Ability to Meet Contractual Commitments to Clients**

HIMCO is not aware of any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

**C. Bankruptcy Filings**

HIMCO has not been the subject of a bankruptcy petition at any time during the past ten years.