The Hartford Financial Services Group, Inc.

Code of Ethics and Business Conduct
For Members of the Board of Directors

Introduction

The Hartford Financial Services Group, Inc. (“The Hartford” or the “Company”) Board of Directors (the “Board”) has adopted the following Code of Ethics and Business Conduct for Members of the Board of Directors (the “Code”). This Code is intended to provide guidance to directors to assist them in identifying and addressing ethical issues, to establish procedures to report unethical conduct and to foster a culture of honesty, integrity and accountability. Each director must comply with the letter and spirit of this Code.

As a leader in the financial services industry with a business history of over two hundred years, it is imperative that The Hartford’s business operations are conducted in accordance with the highest standards of business and personal integrity. Directors are expected to conduct themselves accordingly and to avoid even the appearance of improper behavior. Since this Code cannot anticipate every factual situation that may arise, it is intended to serve as a set of guiding principles for the Company’s directors. Directors are encouraged to bring questions about particular circumstances that may involve one or more of the provisions of this Code to the attention of the General Counsel. Directors who are also officers of the Company should read this Code in conjunction with The Hartford’s Code of Ethics and Corporate Conduct for employees. Non-management directors are encouraged to look to the Company’s employee code of ethics for guidance on issues not addressed by this Code, when conducting business on behalf of The Hartford.

1. Compliance with Laws, Rules and Regulations

Obeying the law and acting in a manner consistent with The Hartford’s core values of honesty, integrity and respect for individuals is the foundation upon which the Company’s ethical standards are built. All directors are expected to conduct their business affairs on behalf of the Company in full compliance with applicable laws, rules and regulations, and shall encourage such behavior for all officers and employees of the Company.

2. Conflicts of Interest

Directors must conduct themselves in a manner that avoids actual or apparent conflict of interests and that protects the Company’s business reputation. A conflict of interest exists when a director’s personal or professional interest is adverse to, or may appear to be adverse to, the interests of the Company. Conflicts of interest may also arise when a director, an “immediate family member"[1] or an organization with which the director is affiliated, receives improper benefits as a result of his or her position as a member of the Board. Any situation that involves, or reasonably may be expected to involve, a conflict of interest with the Company shall be handled in accordance with the Company's Policy for the Review, Approval or Ratification of Transactions with Related Persons. Some of the more common conflict of interest situations that directors must avoid are set forth below:

> **Gifts –** Directors and their immediate families members shall not accept any gift from or give any gift to a third party whom they know does business with the Company beyond those courtesies deemed to be customary, reasonable and proper under the particular business circumstances. A director should refuse any gift offered to them when that gift is being offered to influence the director's actions as a member of the Board or where the acceptance of the gift is likely to create the appearance of a conflict of interest.
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> **Compensation from Non-Company Sources –** Directors may not accept compensation, in any form, for any services performed on behalf of the Company in their capacity as directors from any source other than the Company.
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> **Company Relationships with Third Parties –** Directors may not engage in any conduct or activity that disrupts or impairs the Company's relationship with any third party with whom the Company has or is seeking to establish a contractual relationship.
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> **Loans to Directors/Guarantees of Director Obligations –** Directors may not accept any loan or other form of credit or the renewal of any loan or other extension of credit from the Company. In addition, the Company may not guarantee the obligations of directors.

Any question about a director's actual or potential conflict of interest with the Company should be brought promptly to the attention of the Chair of the Nominating and Corporate Governance Committee or the General Counsel of the Company, who will review the question and determine an appropriate course of action, including whether consideration or action by the full Board is necessary. Where necessary to avoid a conflict of interest, a director must recuse him or herself from any deliberations and decisions related to his or her potential conflict of interest.

3. Corporate Opportunities

Directors owe a duty to the Company to advance its legitimate business interests when the opportunity to do so arises. Directors are prohibited from: (a) using the Company's property, information, resources or their position as a director for any personal gain; (b) taking for or diverting to themselves personally or any third party, including the organizations with which they are affiliated, opportunities that are discovered through the use of The Hartford's property,

[1] As used in this Code, the term "immediate family member" is defined to include child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law or sister-in-law of a person, and any person (other than a tenant or an employee) sharing the household of such person.

information, resources or the director's position; or (c) competing with the Company for corporate opportunities. However, in those situations where the Company's disinterested directors determine that the Company does not wish to pursue a particular corporate opportunity, a director is free to pursue that opportunity.

4. Fair Dealing

The Hartford adheres to a policy of honesty, integrity and fair dealing in all of its activities. Directors shall endeavor to deal fairly with the Company's customers, suppliers, business partners, competitors and employees. No director shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, of material facts or any other intentional unfair-dealing practice in conducting his or her business affairs on behalf of The Hartford.

5. Insider Trading

Except for transactions that under applicable law are exempt from insider trading restrictions, directors may not trade in securities issued by any company while in possession of material, non-public information about that company. In addition, directors may not disclose material, non-public information to others who might use it for trading or might pass it along to others who might trade. Except for transactions that under applicable law are exempt from insider trading restrictions, directors are prohibited from buying or selling Hartford securities unless they have received pre-clearance from The Hartford's Law Department in accordance with the Company's insider trading pre-clearance rules.

6. Confidentiality

Each director during his or her term of office, and after leaving the Board, must maintain the confidentiality of all non-public information relating to the Company or its relationships with its customers, vendors, suppliers, agents, business partners and employees that might be of use to the Company's competitors or harmful to the Company if disclosed, irrespective of whether such information comes to them from the Company or any other source, except when disclosure of any confidential information is authorized or required by law or regulation. Directors are expected to consult the Chairman of the Board or General Counsel if they believe they have a legal obligation to disclose confidential information. No director shall disclose or use any confidential information gained in the course of his or her service as a member of the Board for trading purposes, personal profit or for the advantage of any other person.

7. Protection and Proper Use of Company Assets

Directors must protect the Company's funds and assets and oversee the efficient use of those assets in the best interests of the Company. All Company assets should be used for legitimate business purposes. The loss, theft, misuse or waste of Company assets has a direct impact on

The Hartford's profitability. Directors are prohibited from using any Hartford assets, employees or information for personal use or benefit, except as part of a compensation or expense reimbursement program available to all directors.

8. Reporting Illegal or Unethical Behavior

Directors should promote ethical behavior and support an environment in which the Company encourages Hartford employees to speak to their managers, supervisors or other appropriate personnel identified in the Company's Code of Ethics and Corporate Conduct for employees about observed illegal or unethical behavior, and whenever necessary, about the appropriate course of action in a particular situation. Directors also should ensure that the Company clearly informs all employees that The Hartford will not tolerate or permit retaliation for reports of misconduct made in good faith.

9. Political Contributions

Pay-to-play laws typically restrict the ability of Board members and senior management from contributing to the campaign of certain state and local officials. In order to ensure The Hartford's compliance with "pay-to-play" laws, directors should confer with the General Counsel before they, their spouses or dependent children, contribute, or solicit others to contribute, to a state or local political candidate, a party committee or a federal candidate who is a current state or local office-holder in certain jurisdictions identified by the General Counsel.

10. Waivers

Any waiver or exception to this Code will be granted only in advance and only under exceptional circumstances. All waivers require the approval of the Company's Board of Directors, or an independent committee thereof, and will be disclosed promptly in accordance with applicable laws, rules and regulations, including those of the New York Stock Exchange and the Securities and Exchange Commission.

11. Enforcement of the Code of Ethics

Directors should communicate any suspected violations of this Code or any applicable law, rule or regulation promptly to the Chairman of the Board, Chair of the Nominating and Corporate Governance Committee or the General Counsel of the Company.

All reported violations of this Code will be investigated by the Board, or by a person or persons designated by the Board. The Board shall determine whether a violation of this Code has occurred and the appropriate action to be taken in the event of such violation. Such action shall be designed reasonably to deter future violations and to promote accountability for adherence to the provisions of this Code. In determining the appropriate action for a particular violation, the Board shall consider all relevant information, including the nature and severity of the violation, whether the violation appears to have been intentional or inadvertent, and whether the director involved had been advised prior to the violation as to the recommended course of action.

12. Annual Review and Certification

The Board shall review and reassess the form and adequacy of this Code annually and may make any amendments to this Code as is deemed necessary and appropriate. Each director shall be asked to certify that he or she is in compliance with this Code annually.