

ITEM 1: COVER PAGE

Part 2A of Form ADV: Firm Brochure

HARTFORD INVESTMENT MANAGEMENT COMPANY

March 30, 2012

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This brochure provides information about the qualifications and business practices of Hartford Investment Management Company. If you have any questions about the contents of this brochure, please contact us at 860-297-6700 or 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 Hartford Investment Management Company also is available on the SEC's website at 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 the material changes to this Brochure since the last annual update on March 31, 2011:

1. In Item 4 Section B, additional strategies now offered by Hartford Investment Management have been added and strategies no longer offered have been deleted.
2. In Item 8, description of bank loan investment strategies and their attendant risks have been removed. Although certain portfolios managed by Hartford Investment Management may still invest in bank loans, as of April 23, 2012, HIMCO will no longer manage any portfolios with investment strategies dedicated to investments in bank loans. Disclosure describing hedge fund of funds strategies has also been added.
3. In Item 12 Section A, disclosure regarding Hartford Investment Management's use of research and other soft dollar benefits has been revised to more accurately reflect Hartford Investment Management's use of "Bundled Products and Services."

Hartford Investment Management 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 or by phone at (860) 297-6700. The Brochure is also available on Hartford Investment Management's website free of charge at www.himco.com. Additional information about Hartford Investment Management may also be obtained on the SEC's website 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	10
Item 6: Performance-Based Fees and Side-by-Side Management	15
Item 7: Types of Clients	17
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	18
Item 9: Disciplinary Information.....	26
Item 10: Other Financial Industry Activities and Affiliations	27
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	32
Item 12: Brokerage Practices.....	35
Item 13: Review of Accounts.....	40
Item 14: Client Referrals and Other Compensation.....	42
Item 15: Custody	43
Item 16: Investment Discretion	44
Item 17: Voting Client Securities.....	45
Item 18: Financial Information.....	47

ITEM 4: ADVISORY BUSINESS

A. General Description of Advisory Firm

Hartford Investment Management Company ("Hartford Investment Management") provides investment advisory and investment management services primarily to institutional clients. Hartford Investment Management is a wholly-owned subsidiary of The Hartford Financial Services Group, Inc. ("The Hartford"), and was organized in 1996 by acquiring the business, personnel and corporate name of an affiliate which had been in operation since 1981 and which performed substantially similar services. Because Hartford Investment Management 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 Hartford Investment Management's. As of December 31, 2011, Hartford Investment Management had approximately \$164.9 billion in fixed income and equity assets under management. (Please see [Section E](#) of this Item 4 below for further disclosure regarding assets under management.) Hartford Investment Management advises affiliated and unaffiliated insurance companies, registered and unregistered investment companies, corporations, trusts, pension and profit sharing plans and non-profit organizations and generally provides portfolio management services.

B. Description of Advisory Services

Hartford Investment Management provides discretionary investment management services to institutional and other client portfolios including affiliated entities' general accounts and divisions of insurance company separate accounts, employee benefit plans and unaffiliated insurance companies and corporations.

Hartford Investment Management serves as investment sub-adviser to a number of investment companies registered under the Investment Company Act of 1940 ("1940 Act") and sponsored and distributed by entities affiliated with Hartford Investment Management. Complete information concerning each such investment company is disclosed in its prospectus and statement of additional information.

Principal strategies currently offered by Hartford Investment Management include the following:

Fixed Income

Hartford Investment Management manages fixed income assets by using a disciplined process which is designed to create value from three sources: (i) a macro-economic strategy which considers duration and yield curve and strategic asset allocation, (ii) sector rotation, and (iii) security selection. Please see [Section A of Item 8](#) "**Methods of Analysis, Investment Strategies and Risk of Loss**" for a description of the investment process.

Core Fixed Income – 100% Investment Grade

The objective of the Core Fixed Income – 100% Investment Grade strategy is to actively manage a diversified fixed income portfolio in which accounts are comprised of 100% 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 Barclays Capital U.S. Government/Credit Bond Index or the Barclays Capital U.S. Aggregate Bond Index.

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 Barclays Capital U.S. Government/Credit Index or the Barclays Capital U.S. Aggregate Index.

Core Plus Fixed Income

The objective of the Core Plus Fixed Income strategy is to actively manage a diversified fixed income portfolio in which accounts are normally comprised of more than 60%, but less than 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). The portion invested in securities outside the U.S. investment grade sector will be comprised of fixed income, including high yield, emerging market, and non-dollar denominated securities, and bank loans. The benchmark is the Barclays Capital U.S. Aggregate Index.

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 (including 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. The Strategy may invest in 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 may invest up to 25% of its total assets in securities of foreign issuers. Prior to December 2010, the investment objective of the composite was to provide a high level of income by normally investing only in securities of investment grade quality. The investment objective of the composite was redefined, as noted above, in alignment with a change to the principal investment strategy of the constituent portfolio. The benchmark is the Barclays Capital 1-3 Year U.S. Government/Credit Index.

Intermediate Duration Core Fixed Income

The objective of the Intermediate Duration Core Fixed Income strategy is to actively manage a 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 a duration similar to broad intermediate market benchmark indices that include mortgage securities such as the Barclays Capital Intermediate U.S. Aggregate Index.

Intermediate Duration Core Plus Fixed Income

The objective of the Intermediate Duration Core Plus Fixed Income strategy is to actively manage a high quality diversified fixed income portfolio in which accounts are normally comprised of at least 60% 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 an intermediate market benchmark such as the Barclays Capital Intermediate U.S. Government/Credit Index. The remaining assets may be opportunistically invested in high yield, emerging market, or non-dollar securities.

Core Plus Universal

The objective of the Core Plus Universal strategy is to seek to generate returns, net of fees, in excess of the Barclays Capital U.S. Universal Index on a consistent basis, while maintaining an overall level of risk comparable to that of the Barclays Capital U.S. Universal Index.

High Yield

The objective of the High Yield strategy is to actively manage a high yield portfolio in which accounts are normally invested at least 90% in high yield and emerging market securities. The benchmark is the Barclays Capital U.S. Corporate High Yield Index.

Long Duration Core Fixed Income

The objective of the Long Duration 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) with a duration similar to long duration benchmark indices such as the Barclays Capital Long U.S. Government/Credit Index.

Treasury Inflation Protected Securities (TIPS) – Asset Class

The objective of the TIPS – Asset Class strategy is to actively manage a fixed income portfolio in which accounts are predominantly comprised of Treasury Inflation Protected Securities. The Strategy may also opportunistically invest in other securities such as nominal Treasuries, corporate debt, asset-backed securities, and mortgage-backed and other mortgage-related securities. The benchmark is the Barclays Capital U.S. TIPS Index.

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 Barclays Capital U.S. Aggregate Index. The Strategy will only invest in bonds which are in the Barclays Capital U.S. Aggregate Index or bonds with the same issuer or obligor as those in the Index.

Intermediate Investment Grade Credit

The objective of the Intermediate Investment Grade Credit 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 corporate securities and with duration similar to broad market benchmark indices such as Barclays Capital U.S. Credit, or Intermediate U.S. Credit Indices.

High Grade Enhanced Cash

The objective of the High Grade Enhanced Cash strategy is to actively manage a high quality investment grade diversified fixed income portfolio with a portfolio average maturity of less than 1 year in which accounts are normally comprised of U.S. dollar-denominated securities with a minimum rating of single A-/A-1. The Strategy normally invests in obligations of the U.S. Government and its agencies and instrumentalities, money market instruments, corporate bonds, notes and other debt instruments and asset-backed securities. The benchmark is the Merrill Lynch 3-Month LIBOR Index.

Investment Grade Enhanced Cash

The objective of the Investment Grade Enhanced Cash strategy is to actively manage an investment grade diversified fixed income portfolio with a portfolio average maturity of less than 1 year in which accounts are normally comprised of U.S. dollar-denominated investment grade securities. The Strategy normally invests in obligations of the U.S. Government and its agencies and instrumentalities, money market instruments, corporate bonds, notes and other debt instruments and asset-backed securities. The benchmark is the Merrill Lynch 3 Month LIBOR Index.

Money Market

The objective of the Money Market strategy is to manage a diversified portfolio of commercial paper and other money market instruments within the constraints of Rule 2a-7 of the 1940 Act. These constraints include maintaining a dollar-weighted average portfolio maturity of 60 days or less and a dollar-weighted average life to maturity of 120 days or less. The benchmark is the Merrill Lynch 0-3 Month T-Bill Index.

Emerging Markets Fixed Income

The objective of the Emerging Markets Fixed Income strategy is to actively manage a diversified portfolio of fixed income securities issued by entities within countries commonly considered as emerging markets and to seek to outperform a benchmark such as the JP Morgan EMBI Global Diversified. The Strategy will primarily invest in sovereign and quasi-sovereign emerging markets debt as well as invest opportunistically in corporate and local currency securities.

Dynamic Allocation Fixed Income

The objective of the Dynamic Allocation Fixed Income strategy is to seek to competitive total returns through a market cycle by balancing price appreciation, income generation, and capital preservation. The strategy incorporates macroeconomic factors and trends, market fundamentals, technical factors, and sector and security characteristics into an active and unconstrained portfolio management process. As a result, its composition and risk/return characteristics may vary significantly through a cycle depending upon market conditions. The Strategy normally invests across the full spectrum of issuer quality and domicile, including non-investment grade debt securities, highly rated debt securities, and debt securities of foreign issuers including those located in emerging markets. It also may invest in or hold additional asset classes and investment types including, but not limited to, bank loans or loan participation interests, convertibles securities, preferred stock, and common stock. The Strategy utilizes a custom benchmark designed to realistically portray the degree of asset allocation flexibility available.

Opportunistic Corporate Fixed Income

The objective of the Opportunistic Corporate Fixed Income strategy is to generate long-term total returns through a market cycle by balancing price appreciation, income generation, and capital preservation. This actively managed and diversified strategy normally invests at least 80% of its total assets in corporate debt securities (including bank loans. At least 65% of its total assets will be investment grade rated, and it has the flexibility to hold up to 35% of its total assets in non-investment grade rated securities (including bank loans or loan participation interests). The strategy may invest up to 30% of total assets in a combination of securities issued by foreign issuers or denominated in currencies other than the US Dollar. In addition it may invest up to 15% of total assets in preferred stock, convertible securities, and warrants (including securities carrying warrants) to purchase equity securities or debt securities or loans, and up to 10% in issues purchased as defaulted securities. The benchmark is the Barclays Capital U.S. Corporate Index.

Quantitative Equity

Hartford Investment Management manages equity assets by using quantitative analysis. This involves daily collection of stock price and company fundamental information to create portfolios of desired risk and return levels. The quantitative equity group utilizes proprietary multi-factor models. Please see [Section A of Item 8](#) “**Methods of Analysis, Investment Strategies and Risk of Loss**” for a description of the investment process.

Small/Mid Cap Quantitative Equity

The objective of the Small/Mid Cap Quantitative Equity strategy is to seek to maximize long-term capital appreciation. The strategy utilizes a quantitative-based investment process within a universe normally consisting of at least 80% in common stock of small-capitalization and mid-capitalization companies (as defined by the market capitalization range of companies in the Russell 2500 Index) and has the ability to invest up to 20% in securities of foreign issuers and non-dollar securities. The strategy's benchmark is the Russell 2500 Index.

Extended Large Cap Core Composite

The objective of the Long/Short 130/30 Quantitative Equity strategy is to seek to maximize short- and long-term capital appreciation. The strategy utilizes a quantitative-based investment process with a normal allocation of long positions of up to 130% of total portfolio market value and the ability to short (positions), up to 30% of total portfolio market value, within a primarily U.S. equity universe. The strategy's benchmark is the S&P 500 Index.

Global Enhanced Dividend Composite

The objective of the Long/Short 140/40 Quantitative Global Equity strategy is to seek to achieve a high level of current income as a primary objective, with capital appreciation as a secondary objective. The strategy utilizes a quantitative-based investment process with a normal allocation of long positions of up to 140% of total portfolio market value and the ability to short (positions), up to 40% of total portfolio market value, within a global equity universe. The strategy's benchmark is the MSCI World Value Index.

Asset Allocation

The objective of the Asset Allocation strategy is to use a proprietary asset allocation approach to develop an appropriate mix of asset classes. The Strategies use a “fund-of-funds” approach, investing in a diversified group of underlying funds and are constructed using a disciplined three-step process consisting of: 1) Strategic Asset Allocation 2) Underlying Fund Selection and 3) Dynamic Management.

C. Availability of Customized Services for Individual Clients

Hartford Investment Management may tailor the investment program for certain accounts based on the client's particular needs as well as overall financial condition, goals, risk tolerance and other factors unique to the client's particular circumstances including regulatory restrictions. Hartford Investment Management may also agree to investment guidelines for certain accounts which restrict or prohibit investments in certain securities or asset classes.

D. Wrap Fee Programs

Hartford Investment Management does not provide portfolio management services in connection with any wrap fee programs.

E. Assets Under Management

As of December 31, 2011, Hartford Investment Management had approximately \$164.9 billion of assets under management:

	<u>U.S. Dollar Amount</u>
Discretionary	\$164,332,575,000
Non-Discretionary	<u>\$586,902,000</u>
Total	\$164,919,477,000

Pursuant to a plan announced by The Hartford in December, 2011, Hartford Investment Management will cease serving as sub-adviser to 31 Hartford Mutual Funds. Transition of the management of these funds began in March, 2012. Hartford Investment Management estimates its assets under management as of March 30, 2012 were approximately \$152,780,781,000 and will be approximately \$143,488,129,000 once the transition is complete.

ITEM 5: FEES AND COMPENSATION

A. Advisory Fees and Compensation

Except as noted below, Hartford Investment Management generally receives a percentage of assets under management as compensation for its services. Hartford Investment Management's general fee schedules are included below. The fee schedule may vary due to servicing requirements, account inception date and other factors. Fee schedules for different styles of fixed income and equity management will vary depending on research intensity, degree of active management and size of account. Hartford Investment Management may, in its sole discretion, negotiate terms and charge different fees for certain accounts based on a client's particular needs as well as overall financial condition, goals, risk tolerance and other factors unique to the client's particular circumstances. Hartford Investment Management may enter into agreements that the fees charged for a particular account will be the lowest fees charged. Clients that negotiate fees with differing breakpoints than below may end up paying a higher fee than as set forth below due to fluctuations in the client's assets under management and/or account performance. Hartford Investment Management's standard investment advisory agreement is mutually revocable at any time without penalty and continues in effect until 30 days after written notice of termination is given by either party.

Standard fee schedules for unaffiliated clients in principal investment strategies are as follows:

CORE – 100% INVESTMENT GRADE

Assets	Basis Points
First \$75 Million	25
Next \$100 Million	20
Next \$300 Million	18.5

HIGH YIELD

Assets	Basis Points
First \$25 Million	50
Next \$75 Million	40
Next \$100 Million	35
Over \$200 Million	Negotiable

CORE FIXED INCOME

Assets	Basis Points
First \$75 Million	25
Next \$100 Million	20
Next \$300 Million	18.5

TREASURY INFLATION PROTECTED SECURITIES (TIPS)

Assets	Basis Points
First \$25 Million	20
Next \$75 Million	15
Over \$100 Million	10

CORE PLUS FIXED INCOME

Assets	Basis Points
First \$75 Million	30
Next \$100 Million	25
Next \$300 Million	20

EMERGING MARKETS FIXED INCOME

Assets	Basis Points
First \$25 Million	60
Next \$75 Million	55
Next \$100 Million	50
Over \$200 Million	Negotiable

INTERMEDIATE DURATION CORE

Assets	Basis Points
First \$75 Million	25
Next \$100 Million	20
Next \$300 Million	18.5

SHORT DURATION

Assets	Basis Points
First \$75 Million	20
Next \$100 Million	15

LONG DURATION CORE

Assets	Basis Points
First \$75 Million	25
Next \$100 Million	20

INTERMEDIATE DURATION CORE PLUS

Assets	Basis Points
First \$75 Million	30
Next \$100 Million	25
Next \$300 Million	20

HIGH GRADE ENHANCED CASH

Assets	Basis Points
First \$25 Million	20
Over \$25 Million	15

MONEY MARKET

Assets	Basis Points
First \$25 Million	15
Over \$25 Million	10

PASSIVE U.S. AGGREGATE BOND INDEX

Assets	Basis Points
First \$500 Million	5
Next \$500 Million	2
Over \$1 Billion	1
<i>Standard Minimum Separate Account Size \$250 million</i>	

INVESTMENT GRADE ENHANCED CASH

Assets	Basis Points
First \$25 Million	20
Over \$25 Million	15

INTERMEDIATE INVESTMENT GRADE CREDIT

Assets	Basis Points
First \$25 Million	30
Next \$75 Million	25
Over \$100 Million	20

SMALL / MID CAP QUANTITATIVE EQUITY

The highest management fee for this product is 0.85%

EXTENDED LARGE CAP CORE COMPOSITE

The highest management fee for this product is 0.75%

Institutional Commingled Trusts: Hartford Investment Management manages a private placement trust with six series (2 of which are not currently offered) exempt from registration under Section 3(c)(1) of the 1940 Act. Annual fees paid by each series based on the average net assets of the respective series are as follows:

Assets	Basis Points*
Core Fixed Income Series	25
Core Plus Fixed Income Series	30
High Yield Series	50
Treasury Inflation Protected Securities (TIPS) Series	15
Core Plus Universal Series	15
Emerging Markets Fixed Income Series	50

* Hartford Investment Management reserves the right to waive or reimburse all or a portion of its fees for certain of the trust's investors.

Real Estate Funds: Hartford Investment Management serves as co-manager of a private placement real estate mezzanine fund. Hartford Investment Management receives one half of the fund management fee which fund management fee is equal to 1.5% of capital commitments to the fund for the investment period and 1% of the invested capital thereafter. The fund management fee is payable quarterly in arrears. Hartford Investment Management also receives half of the fund's incentive management fee. (See [Performance Based Fees](#) in **Item 6** below).

Bank Loan CLOs:

Bank Loan CLO I

Senior Collateral Servicing Fee	0.05%
Subordinated Collateral Servicing Fee	0.10%
Incentive Collateral Servicing Fee	10% of all Collateral Interest Collections and Collateral Principal Collections available on such Payment Date after all prior uses pursuant to the Priority of Payments (as such terms are defined in the Offering Circular)

Bank Loan CLO II

Senior Collateral Servicing Fee	0.05%
Subordinated Collateral Servicing Fee	0.10%
Incentive Collateral Servicing Fee	10% of all Collateral Interest Collections and Collateral Principal Collections available on such Payment Date after all prior uses pursuant to the Priority of Payments (as such terms are defined in the Offering Circular)

Corporate Credit CDOs

<i>Base Management Fee:</i>		<i>Deferred Management Fee:</i>	
Series 26	0.075%	Series 26	0.025%
Series 27	0.10%	Series 27	0.05%
Series 28	0.15%	Series 28	0.05%
Series 29	0.15%	Series 29	0.05%
Series 30	0.20%	Series 30	0.10%
Series 31	0.30%	Series 31	0.10%

See [Types of Clients](#) in **Item 7** below for minimum account sizes. Investment strategies described in Item 4B but not reflected in the fee schedule above are currently only offered through mutual funds sub-advised by Hartford Investment Management. Clients investing directly in mutual funds sub-advised by Hartford Investment Management will bear the fees and expenses disclosed in such mutual fund's prospectus.

B. Payment of Fees

Fees are generally payable to Hartford Investment Management Company quarterly in arrears based on the quarter-end market value or average value for the quarter. Hartford Investment Management sends a quarterly bill to each client or their designee for the amount due which states both the value of the account on which the fee was based and the manner in which the fee was calculated. Clients are responsible for verifying that the fee was correctly calculated. 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.

Hartford Investment Management is reimbursed on a cost basis for expenses incurred in managing affiliated assets, including affiliated entities' general accounts, divisions of separate accounts and mutual funds sponsored by affiliated entities. Hartford Investment Management does not specifically identify or bill costs on a portfolio-by-portfolio or fund-by-fund basis to its affiliates. Rather, all expenses for managing affiliated assets including affiliated mutual fund assets are identified to Hartford Investment Management's insurance affiliates on an aggregate level. The affiliated advisor of the mutual funds may independently calculate an estimated sub-advisor fee based upon its own allocation method. The sub-

advisory contracts between Hartford Investment Management and the funds can be terminated without penalty by the funds and terminate automatically upon assignment as defined in the 1940 Act.

C. Additional Fees and Expenses

Clients will pay all interest, charges, taxes, fees, commissions, brokerage costs and expenses of every kind related to their account. Clients may also bear expenses “passed through” from third parties performing services such as of audit, administration and custody expenses. See [Item 12](#) “**Brokerage Practices.**” In addition, clients whose uninvested assets are swept into money market mutual funds for short-term cash management purposes either by Hartford Investment Management 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 may (depending on the arrangement) bear the fees and costs associated with such collective investment vehicles, as well as the investment advisory fee of Hartford Investment Management. Clients investing directly in mutual funds sub-advised by Hartford Investment Management will bear the fees and expenses disclosed in such mutual fund’s prospectus.

Hartford Investment Management may from time to time, in its discretion, elect to participate in bankruptcies or workouts involving issuers of securities held in advisory accounts and to join creditors committees or informal steering committees on behalf of some or all of its clients. Hartford Investment Management may in its discretion pass along, in addition to the fees noted below, the pro-rata costs of participating in such litigation or workouts (including legal fees) to participating advisory accounts.

D. Prepayment of Fees

Clients of Hartford Investment Management are not required to pre-pay fees.

E. Additional Compensation and Conflicts of Interest

Hartford Investment Management does compensate certain of its own employees for their activities related to institutional sales. A portion of the compensation of certain employees includes a percentage of the first year’s advisory fees paid to Hartford Investment Management by clients or investors referred to Hartford Investment Management by such sales personnel.

1. These practices present a conflict of interest as such employees could be incentivized to recommend investment products based on the compensation received, rather than on a client’s needs. All Hartford Investment Management employees eligible to receive compensation related to institutional sales are required to provide certain disclosures to prospective clients as mandated by Rule 206(4)-3 of the Investment Advisers Act, which includes disclosing to prospective clients the solicitor’s position with HIMCO or its affiliate and the nature of the relationship. The disclosures required by Rule 206(4)-3 are necessary to inform prospective clients about the nature of the solicitor’s financial interest in the recommendation so they may consider the solicitor’s potential bias, and to protect prospective clients against solicitation activities being carried out in a manner inconsistent with the firm’s fiduciary duty to clients. Each solicitor is also required to undergo an enhanced background check to ensure that they have not been subject to certain disciplinary actions that indicate the committing of fraud or other similar acts.
2. Of the various products and services Hartford Investment Management provides, only mutual funds sub-advised by Hartford Investment Management are available through brokers or agents not affiliated with Hartford Investment Management.

3. Less than 50% of revenue generated by Hartford Investment Management results from commissions and other compensation for the sale of investment products recommended by Hartford Investment Management to our clients.
4. Hartford Investment Management does not charge commissions or markups.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Hartford Investment Management does receive performance based fees from certain accounts and certain investment professionals manage both accounts that are charged a performance based fee and accounts that are charged other types of fees.

Hartford Investment Management is the co-manager of a private placement real estate mezzanine fund. As such, Hartford Investment Management receives half of the fund's management fee and the incentive management fee. The management fee is 1.5% of capital commitments to the fund for the original investment period and 1% of invested capital thereafter. The incentive management fee is payable after the investors receive a preferred return of 8% on their contributed capital and after the fund's investors receive distributions equal to (a) their invested capital relating to all fund investments, plus (b) their contributions used for expenses, including fees. Then the managing members (Hartford Investment Management being one of the two managing members, who share the incentive management fee equally) will receive 20% of the distributable cash flow and the fund's investors will receive 80% of such cash flow until the fund's investors have received a cumulative compounded annual return of 10% on their invested capital. Thereafter, the managing members will receive 70% of the distributable cash flow and the investor members will receive 30% of such cash flow until the managing members have received 20% of the sum of such amounts distributed to them plus the amount of the distributions paid to the fund investors (other than amounts paid to the fund investors pursuant to (a) and (b) above). Any remaining distributable cash flow will be distributed 20% to the managing members and 80% to the fund's investors.

Certain of the fees described in each of the structured finance vehicles noted above in [Section A of Item 5 "Fees and Compensation"](#) (Bank Loan CLOs and Corporate Credit CDOs) could also be considered performance based fees. In addition to reserving the right to negotiate and charge different management fees for accounts based on client specific needs and goals as noted above, Hartford Investment Management also reserves the right, in its sole discretion, subject to applicable law, to negotiate and charge performance-based fees or include a performance based component to any of its fee structures.

Side-by-side management by Hartford Investment Management of registered investment companies and non-U.S. mutual funds, managed accounts and private investment funds may raise potential conflicts of interest, including conflicts associated with the differences in fee structures for such products. Performance-based fees may provide an incentive for Hartford Investment Management 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 prospect of earning a higher compensation from a portfolio with a higher fee structure (such as a private fund with a performance-based fee) may provide Hartford Investment Management with an incentive to favor the portfolio with the higher fee structure when, for example, allocating securities transactions expected to more likely result in favorable performance. In addition, in connection with organizing a private investment fund which focuses on a particular asset class, such as structured real estate debt securities, Hartford Investment Management may contractually promise to provide such fund with the first consideration of relevant investment opportunities before offering such opportunities to other clients' accounts which may be eligible to invest therein. Such private investment funds may provide greater fees (including performance based fees) or may be funds in which related persons of Hartford Investment Management have an interest.

Portfolio managers, including assistant portfolio managers, at Hartford Investment Management manage multiple portfolios for multiple clients. These accounts may include affiliated and non-affiliated mutual funds, separate accounts (assets managed on behalf of institutions such as pension funds, insurance companies, foundations), commingled trust accounts, collective trusts and other types of funds. The portfolios managed by portfolio managers may have investment objectives, strategies and risk profiles that differ from each other. Portfolio managers make investment decisions for each portfolio based on

the investment objectives, policies, practices and other relevant investment considerations applicable to that portfolio. Consequently, the portfolio managers may purchase securities for one portfolio and not another portfolio. Securities purchased in one portfolio may perform differently than the securities purchased for another portfolio. A portfolio manager or other investment professional at Hartford Investment Management may place transactions, including short sale transactions, on behalf of one portfolio that are directly or indirectly contrary to investment decisions made on behalf of other portfolios, or make investment decisions that are similar to those made for other portfolios, both of which have the potential to adversely impact one portfolio and not another, depending on market conditions. In addition, some portfolios may have fee structures that are or have the potential to be higher, in some cases significantly higher, than the fees paid by other portfolios to Hartford Investment Management. Because a portfolio manager's compensation is affected by revenues earned by Hartford Investment Management, the incentives associated with any given portfolio may be significantly higher or lower than those associated with other portfolios managed by a given portfolio manager.

Fees are generally based on the account values determined in accordance with Hartford Investment Management's Pricing Policy. To the extent that Hartford Investment Management's fees are based on account values, Hartford Investment Management may benefit by receiving a fee based on the impact, if any, of 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 may arise in that Hartford Investment Management's interests would be served by placing the highest possible value on that security. Although Hartford Investment Management is not the official agent of record for client portfolios (other than the affiliated general accounts and guaranteed separate accounts of affiliated insurance companies), Hartford Investment Management may provide assistance to the official pricing agents of clients' accounts, typically custodians, fund administrators or accounting agents, but has adopted a pricing policy and procedures to manage the conflict posed by pricing securities for which there is no readily available market value.

Hartford Investment Management's goal is to provide high quality investment services to all of its clients, while meeting our fiduciary obligation to treat all clients fairly, and Hartford Investment Management has adopted and implemented policies and procedures, including brokerage and trade allocation policies and procedures, that it believes address the conflicts associated with managing multiple accounts for multiple clients. Moreover, Hartford Investment Management monitors a variety of areas, including compliance with applicable laws and regulations, investment guidelines, the allocation of securities, and compliance with Hartford Investment Management's Code of Ethics. See [Item 11](#) **"Code of Ethics, Participation or Interest in Client Transactions and Personal Trading"** and [Item 12](#) **"Brokerage Practices."**

ITEM 7: TYPES OF CLIENTS

Hartford Investment Management provides investment management services to institutional and other client portfolios including affiliated and unaffiliated insurance companies, registered and unregistered investment companies, corporate retirement plans, public funds, endowments, foundations, and other institutional accounts, state and local government enterprises and religious organizations.

Hartford Investment Management serves as an asset manager for its affiliates, including Hartford Fire Insurance Company and Hartford Life Insurance Company ("Hartford Life"). Hartford Investment Management provides investment advisory services for a variety of vehicles that support Hartford Life's product mix.

Hartford Investment Management also provides investment advice to pooled investment vehicles. Hartford Investment Management serves as investment sub-adviser to a number of investment companies registered under the 1940 Act and sponsored and distributed by entities affiliated with Hartford Investment Management. In addition, Hartford Investment Management provides investment management services to unit trusts organized under the laws of Ireland.

Hartford Investment Management also manages private funds. In particular, Hartford Investment Management manages a private placement hedge fund of funds, a fixed income private placement investment fund, and a private placement trust with six series, all of which are exempt from registration pursuant to either Section 3(c)1 or Section 3(c)7 of the 1940 Act. Hartford Investment Management is also co-manager of a private placement real estate mezzanine fund. Information about each private fund, including required investor qualifications, can be found in its confidential offering memorandum or offering circular. Hartford Investment Management also provides investment management services to certain collateralized debt obligations (CDOs) and collateralized loan obligations (CLOs).

As a general rule, Hartford Investment Management requires a minimum of \$40 million for starting or maintaining a managed separate account, although certain strategies may have lower or higher account minimum requirements. Hartford Investment Management requires a minimum investment of \$5 million in the institutional commingled trust, \$10 million in the hedge fund of funds and \$25 million in the fixed-income private investment fund. A minimum investment of \$1 million is required in the private placement real estate mezzanine fund. Hartford Investment Management retains the ability to waive minimum amounts. No minimum investment applies to the management of its registered investment companies.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. Methods of Analysis and Investment Strategies

Fixed Income Strategies

Hartford Investment Management manages fixed income assets by using a disciplined process which is designed to create value from three sources: (i) a macro-economic strategy which considers duration and yield curve and strategic asset allocation, (ii) sector rotation, and (iii) security selection. Each of these three sources of value added is analyzed along a three-pronged approach: fundamentals, market pricing, and market technicals. Fundamental analysis consists of evaluating the macro-economic environment, major fixed income market sectors, and securities. Market pricing is then examined, and an evaluation is made by various teams to determine if market prices accurately reflect fundamentals. If they do not, this presents an opportunity to buy or sell in the markets or securities examined.

Hartford Investment Management then uses market technicals to assist with the implementation of our buy and sell decisions. Hartford Investment Management's investment process begins at the macroeconomic level. Each month, Hartford Investment Management's Investment Strategy Committee meets to discuss the U.S. and global economies, fiscal and monetary policies and inflation. The Investment Strategy Committee is comprised of key senior investment professionals. As part of this process, the Investment Strategy Committee receives input from certain sector head portfolio managers, who provide their view regarding their respective sector of the fixed income market. The Investment Strategy Committee takes the input from sector teams and establishes Hartford Investment Management's opinion on the economy, interest rates and sector relative value. Ultimately, portfolio managers are responsible for the final decisions on the composition of client portfolios by synthesizing various sources of information including client guidelines, the views of the Investment Strategy Committee on duration, yield curve, and sector weights, and sector head portfolio manager recommendations.

Sector Level Analysis and Investment Strategies

- Investment Grade Credit: Hartford Investment Management employs a fundamentally driven, research-intensive investment process to manage assets invested in the Investment Grade Credit Sector ("IG Credit"). As mentioned above, analysis and investment strategy in IG Credit (and other market sectors) is fully integrated with the firm's Investment Strategy Committee process. Research analysts, traders, and portfolio managers work under the direction of the IG Credit Sector Head, who is ultimately responsible for strategy recommendations and performance within the sector. The IG Credit team contributes key inputs to the firm's Investment Strategy Committee and utilizes relevant outputs to update its sector views. IG Credit research incorporates a holistic review of an issuer's industry and competitive position, business strategy, operating profile, financial condition, and management. Financial analysis includes 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). Analysts also conduct structural analysis by reviewing bond indentures, prospectuses, and other legal documents. This enables Hartford Investment Management to identify specific characteristics including the level of covenant protection, and security-level relationships within an issuer's capital structure. IG Credit Analysts collaborate with traders to synthesize fundamental and structural analysis with a specialist assessment of current market conditions and securities pricing. This investment process provides the IG Credit team with a consistent framework to determine relative value, risk, and performance potential across industries, issuers, and securities.

- Leveraged Credit Assets – High Yield: Our evaluation of every high yield debt instrument starts with a valuation of the assets the issuer of the security. Typically, Hartford Investment Management performs fundamental credit research in order to value. To perform this valuation, Hartford Investment Management performs a discounted cash flow analysis of the issuer for comparison with similar analysis conducted across multiple industry peers to arrive at a valuation for the corporate entity. Considering this valuation, Hartford Investment Management then assess the priority of claims on that valuation by the various debt securities within the capital structure (security priority), how that priority level can change through further debt issuance (covenant analysis) and compensation at each level of the corporate structure (yield analysis). Hartford Investment Management uses these factors to compare securities both within industries and across industries in order to maximize both asset coverage and yield versus the benchmark in our high yield strategy.
- Asset Backed Securities (ABS): Hartford Investment Management will analyze the issuer's fundamental underwriting practices, historical performance of previously issued securities and motivation for utilizing the ABS market. The team assesses security structures and other factors to determine the alignment of interests between ABS investors and issuers. With respect to "programmable" or frequent issuers of ABS securities, Hartford Investment Management maintains a database containing key collateral and structural metrics of as many past transactions as possible. For "non-programmable" or infrequent issuers Hartford Investment Management analyzes the collateral and structure of the transaction against other similar transactions in the market place. Finally, Hartford Investment Management develops performance expectations and stress tests those expectations through the transaction's cash flow waterfall. The relative value and credit merits of each transaction are then compared to other similar ABS to arrive at an investment decision.
- Collateralized Mortgage Backed Securities (CMBS): Hartford Investment Management begins its evaluation of every CMBS bond with a review of the assets underlying the bonds. Typically, this involves a re-underwriting of properties and loans within each deal. For certain CMBS, Hartford Investment Management uses an internally developed underwriting model to perform bottom-up, fundamental analysis of CMBS deal structures. This underwriting combines market forecast of rents and vacancy by property type and sub-market along with tenant rollover to derive monthly cash flows for each property. The projected loan level losses are then modeled to examine the impact on the CMBS capital structure. Hartford Investment Management analyzes the underwriting results to determine points in the capital structure where Hartford Investment Management believes investors are being adequately compensated for the risk and arrive at an investment decision.

Quantitative Equity Strategies

Hartford Investment Management manages equity assets by using quantitative analysis. This involves daily collection of stock price and company fundamental information to create portfolios of desired risk and return levels. The quantitative equity group utilizes proprietary multi-factor models. Each model follows the same basic structure but is customized to a given investment strategy/product. Hartford Investment Management also employs its quantitative-based investment process for specified "extension" portfolios. Hartford Investment Management's "extension" portfolios increase their long positions to a specified amount (i.e. 130% or 140% of total portfolio market value) while simultaneously shorting positions up to a specified amount (i.e. 30% or 40%), in order to keep the portfolio invested fully in the market (100% net position) consistent with other long-only mandates.

Asset Allocation Strategies

Hartford Investment Management uses a proprietary asset allocation approach to develop an appropriate mix of asset classes for each portfolio. Portfolios are constructed using a disciplined three-step process consisting of: 1) strategic asset allocation, 2) underlying fund selection, and 3) dynamic management. In total, twenty-one asset classes are utilized and vary from standard equities and fixed income funds to alternative asset classes. To determine the targets for each fund, Hartford Investment Management uses an exhaustive analysis of each asset classes' long-term and shorter-term historical performance and correlations. In addition to historical performance, implied market returns and input from the underlying portfolio managers are considered. This information is then subjected to an optimization process to determine optimal targets at specified points along the efficient frontier to attempt to ensure the portfolios are well diversified across asset classes. After the optimal asset allocation has been determined, each available underlying fund is analyzed to determine asset class exposure, the value added by the manager's skill, and the likelihood that performance will be sustained.

As part of the dynamic management process, asset allocation targets of each portfolio and underlying funds are reviewed on a regular basis to ensure that asset class exposure remains targeted, and that the most attractive mix of funds are used.

Hedge Fund of Funds Strategy

Hartford Investment Management's process for building hedge fund of funds portfolios begins with the development of a strategic mix of underlying hedge fund strategies consistent with the risk tolerance and objectives of the client. After a strategic allocation is determined, analysis is conducted across the universe of underlying investable hedge funds to find managers who we believe have competitive advantages in their particular discipline and can deliver the risk/return profile that fits best in the overall portfolio. Emphasis is put on finding a portfolio of investments that are both qualitatively and quantitatively differentiated from one another. Due diligence is conducted across several aspects of each underlying hedge fund including: the mechanics of the investment process, operational and compliance procedures, counterparties and service providers, and legal documents. Fund investments are then sized based upon the expected volatility of the investment and its diversification value (correlation with other investments). Portfolios of funds are then actively managed based on the ongoing assessment of the underlying funds ability to continue perform in line with initial expectations and the prospects for returns across different strategies.

Investing in securities involves the risk of loss including possible loss of principal that clients should be prepared to bear.

B. Material, Significant or Unusual Risks Relating to Investment Strategies

Fixed Income Strategies:

Fixed income and bank loans strategies are subject to credit and interest rate risk, liquidity risk, prepayment risk and recovery and call risk:

- Credit risk refers to the possibility that the issuer of a security will not be able to make principal and interest payments when due.
- Liquidity risk refers to the risk that that certain securities may be 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.

- Interest rate risk refers to the risk that investments may 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. Falling interest rates also create the potential for a decline in the portfolio's income. These risks are greater during periods of inflation.
- Extension risk refers to 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 portfolio to exhibit additional volatility.
- Prepayment risk refers to the risk that when interest rates decline, borrowers may pay off their obligations sooner than expected. This can reduce the returns of a portfolio because Hartford Investment Management may have to reinvest that money at lower prevailing interest rates.
- Recovery risk refers to the risk that a security holder may not recover some or all of its principal after a security has defaulted.
- Call risk refers to the risk that an issuer, during a period of falling interest rates, may 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.

Certain strategies may use derivatives, such as options and futures, which can be illiquid, may disproportionately increase losses, and have a potentially large impact on performance.

Certain strategies using foreign fixed-income securities, including emerging markets, are subject to certain risks of overseas investing, including currency fluctuations and changes in political and economic conditions.

Certain strategies may invest in high yield bonds, which are rated below investment grade and carry more risk than higher-rated securities. These risks are magnified in emerging markets.

Emerging Markets Fixed Income: All investments are subject to risk, including possible loss of principal. The securities markets of Asian, Latin American, Eastern European, African and other emerging countries are generally less liquid, are 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. Further, investment in equity securities of issuers located in Russia and certain other emerging countries involves risk of loss resulting from problems in share registration and custody and substantial economic and political disruptions. These risks are not normally associated with investments in more developed countries.

TIPS – Asset Class: Strategies involving the use of TIPS are subject to the risks associated with inflation protected securities. Please see [Section C](#) below.

Money Market: Money market portfolios are not insured or guaranteed by the Federal Deposit Insurance Corporation (FDIC) or any other government agency.

Municipal Strategies: Certain investors in municipal strategies or products may be subject to the Federal Alternative Minimum Tax (AMT), and state and local taxes may apply. Investments in municipal securities involve risks such as the possibility that the issuer may be unable to repay the obligation, the relative lack of information about certain issuers or municipal securities, and the possibility that state local or political or economic conditions and developments can adversely affect the obligations.

Quantitative Equity Strategies:

Quantitative equity strategies involve the risk that the value of securities selected using quantitative analysis can react differently to issuer, political, market, and economic developments than the market as a whole or securities selected using only fundamental analysis. The factors used in quantitative analysis and the weight placed on those factors may not be predictive of a security's value. In addition, factors that affect a security's value can change over time and these changes may not be reflected in the quantitative model.

Small/MidCap Quantitative Equity: Investing in small or mid-sized companies generally involves higher risk than a strategy that invests in larger, more established companies. These companies may have limited operating or business history. Small and mid sized businesses frequently rely on narrower product lines and niche markets, and thus, can suffer severely from isolated business setbacks. Smaller 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.

Certain strategies using foreign equity securities, including emerging markets, are subject to certain risks of overseas investing, including currency fluctuations and changes in political and economic conditions. These risks are magnified in emerging markets.

The Extended Large Cap Core Composite investment strategy and the Global Enhanced Dividend Composite investment strategy may involve more risk than other investment strategies that do not engage in short selling. By investing the proceeds received from selling securities short, the strategy is employing a form of leverage. The use of leverage may increase the strategy's exposure to long equity positions and make any change in the strategy's value greater than without the use of leverage. The long/short approach of these strategies could result in a relatively higher level of portfolio turnover.

The Global Enhanced Dividend Composite involves investments in foreign securities, including emerging markets, which are subject to certain risks of overseas investing, including currency fluctuations and changes in political and economic conditions.

Although the Extended Large Cap Core Composite investment strategy and the Global Enhanced Dividend Composite investment strategy, may result in relatively higher levels of portfolio turnover, Hartford Investment Management does not employ high volume trading or investment strategies generally included in market definitions of 'high frequency trading' investment styles. Hartford Investment Management monitors investment and portfolio management activity (including turnover and trading frequency) across its full suite of investment products and strategies to ensure that trading volumes and execution costs remain consistent with the defined scope, targeted risk profile, competitive landscape, and investor expectations.

Asset Allocation Strategies:

The strategies have limitations on the amount of assets that may be allocated to each asset class, which make each less flexible in its investment strategy. The strategies are exposed to the risks of the underlying funds in direct proportion to the allocation to each underlying fund. In addition to each strategy's own fees and expenses, clients will indirectly bear the underlying funds' fees and expenses. Each strategy's performance and transaction costs may be increased by rebalancing among underlying funds.

Hedge Fund of Funds Strategy:

The strategy is exposed to the risks of the underlying funds in direct proportion to the allocation to each underlying fund. Risks in hedge fund strategies include but are not limited to equity market risk, interest

rate duration risk, currency and commodity market risk, leverage risk and short selling risk. In addition, hedge fund investments in many cases have business risk associated with narrowly focused businesses and key man risk relating to the primary portfolio managers on underlying strategies.

C. Risks Associated With Particular Types of Securities

Risks Generally Associated with Fixed Income Securities:

Fixed income securities are subject to credit risk. Securities that pay high dividends as a group can fall out of favor with the market, causing a portfolio to underperform portfolios that do not focus on dividends. A focus on dividend yielding investments may cause portfolio value to fluctuate more than portfolios that do not focus their investments on dividend paying securities. In addition, income provided by a security may be affected by changes in the dividend policies of the issuer and the capital resources available for such payments at such issuer.

Securities rated below investment grade (also referred to as “junk bonds”) are subject to heightened credit risk, which can result in a portfolio being more sensitive to adverse developments in the U.S. and abroad. 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 may fluctuate more than higher quality securities and may decline significantly in periods of general economic difficulty. There may be little trading in the secondary market for particular debt securities which may make them more difficult to value or sell.

Fixed income securities are subject to interest rate risk and may decrease in value when interest rates rise. 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. Falling interest rates also create the potential for a decline in a portfolio’s income. These risks are greater during periods of inflation.

Municipal securities are subject to risks that include the possibility that the issuer may be unable to repay the obligation, the relative lack of information about certain issuers of municipal securities, and the possibility of future legislative changes which could affect the market for and value of municipal securities. In addition, state or local political or economic conditions and developments can adversely affect the obligations issued by state and local governments. The value of the obligations may be adversely affected by future changes in federal or state income tax laws, including tax rate reductions or the determination that municipal securities are subject to taxation.

Inflation protected securities are subject to the risks associated with inflation-protected securities (“IPS”). Risks associated with IPS investments include liquidity risk, interest rate risk, prepayment risk, extension risk and deflation risk (with deflation, the principal value of IPS holdings would be adjusted downward).

Treasury obligations may differ in their interest rates, maturities, times of issuance and other characteristics. Obligations of U.S. Government agencies and authorities are supported by varying degrees of credit but generally are not backed by the full faith and credit of the U.S. Government. No assurance can be given that the U.S. Government will provide financial support to its agencies and authorities if it is not obligated by law to do so. There can be no guarantee that a portfolio will achieve or maintain any particular level of yield. Money market portfolios are not insured or guaranteed by the Federal Deposit Insurance Corporation (FDIC) or any other government agency.

When-issued and delayed delivery securities and forward commitments involve the risk that the security will lose value prior to its delivery. There also is the risk that the security will not be issued or that the other party to the transaction will not meet its obligation. If this occurs, an investor loses both the investment opportunity for the assets it set aside to pay for the security and any gain in the security’s

price. In addition, fixed income securities are subject to currency risk, the risk that changes in the exchange rate between currencies will adversely affect the value (in U.S. dollar terms) of an investment.

Risks Generally Associated with Equity Securities:

Equity securities are subject to market risk. Market risk is 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. Investments in small capitalization and mid capitalization companies involve greater risks than investments in larger, more established companies. These securities may be subject to more abrupt or erratic price movements and may be subject to greater liquidity risk. In addition, these issuers often face greater business risks. ADRs are subject to various risks of loss that are different from the risks of investing in securities of U.S.-based companies. Investments in the securities of foreign issuers, including emerging markets, involve significant risks that are not typically associated with investing in the securities of domestic issuers.

Investments in warrants may involve substantially more risk than investments in common stock. If the price of stock underlying a warrant does not rise above the exercise price before the warrant expires, the warrant generally expires without any value and the portfolio loses any amount it paid for the warrant. Warrants may trade in the same markets as their underlying stock; however, the price of the warrant does not necessarily move with the price of the underlying stock

Risks Generally Associated with Derivatives:

Derivatives are instruments whose value depends on, or is derived from, the value of an underlying asset, reference rate or index. Derivatives are volatile and may involve significant risks. In addition to credit risk liquidity risk and currency risk described above, derivatives may be subject to leverage risk and index risk.

- Leverage Risk refers to the risk that relatively small market movements may result in large changes in the value of an investment. Certain investments that involve leverage can result in losses that greatly exceed the amount originally invested.
- Index Risk refers to 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), may 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.

Risks Generally Associated with Structured Products:

Structured products include agency and non-agency mortgage-related securities (e.g., collateralized mortgage obligations (CMOs)), including (a) interest-only (IO) and principal-only (PO) classes, (b) real estate mortgage investment conduits (REMICs), (c) stripped mortgage-backed securities (SMBs), (d) asset-backed securities (ABS), which may include pass-through securities, securities backed by or representing interests in any financial assets the terms of which generate cash flows, (e) collateralized debt obligation (CDO) securities, (f) collateralized loan obligations (CLOs), (g) structured notes and (h) mortgage derivatives.

A class of structured securities may be subordinated to the right of payment of another class. Subordinated structured securities typically have higher yields and present greater risks than unsubordinated structured securities. Structured securities markets have recovered substantially from the extremely distressed conditions during 2008-2009; however, certain sectors and/or structures may

continue to experience pricing and liquidity challenges. Mortgage- and asset-backed securities represent interests in “pools” of mortgages or other assets, including consumer loans or receivables held in trust. Mortgage-backed securities are subject to “prepayment risk” and “extension risk.” Holders of mortgage-backed or asset-backed securities that are subordinated to other interests in the same mortgage pool may only receive payments after the pool’s obligations to other investors have been satisfied. An unexpectedly high rate of defaults on the mortgages held by a mortgage pool may limit substantially the pool’s ability to make payments of principal or interest, reducing the values of those securities or in some cases rendering them worthless. The risk of such defaults is generally higher in the case of mortgage pools that include so-called “subprime” mortgages.

The main risk of real estate related securities is that the value of the underlying real estate may go down. Many factors may affect real estate values. These factors include both the general and local economies, the amount of new construction in a particular area, the laws and regulations (including zoning and tax laws) affecting real estate and the costs of owning, maintaining and improving real estate. The availability of mortgages and changes in interest rates may also affect real estate values. The real estate industry is particularly sensitive to economic downturns. If real estate related investments are concentrated in one geographic area or in one property type, the portfolio risks associated with that area or property type will be greater.

Risks Generally Associated with ETFs, Unregistered Investment Products and Pooled Investment Vehicles:

Hartford Investment Management may also invest in mutual funds and exchange traded funds (“ETFs”) and exchange traded notes (“ETNs”). Hartford Investment Management may also buy and sell interests in investment companies which may not be registered under the 1940 Act, such as holding company depository receipts (“HOLDRs”) as well as private placements in pooled investment vehicles and other private issuers. In addition, Hartford Investment Management offers advice on interests in partnerships and other vehicles that invest in mortgage-related securities such as real estate investment trusts (REITs), multiple class pass-throughs, whole loans, leveraged fixed-income portfolios and/or direct interests in real estate.)

An investment in an ETF generally presents the following risks: the same primary risks as an investment in a fund that is not exchange-traded that has the same investment objectives, strategies and policies as the ETF; the risk that the ETF may fail to accurately track the market segment or index that underlies its investment objective; price fluctuation, resulting in a loss to the fund; the risk that the ETF may trade at a price that is lower than its NAV; and the risk that an active market for the ETF’s shares may not develop or be maintained. The portfolio will indirectly pay a proportional share of the asset-based fees of the ETFs. ETFs are also subject to specific risks depending on the nature of the ETF, such as liquidity risk, sector risk, and foreign and emerging market risk, as well as risks associated with fixed income securities, real estate investments and commodities. An investment in an ETF presents the risk that the ETF may no longer meet the listing requirements of any applicable exchanges on which the ETF is listed.

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

Hartford Investment Management is not a registered broker-dealer. Hartford Investment Management is affiliated with Hartford Equity Sales Company ("HESCO"), a registered broker-dealer, and certain employees of Hartford Investment Management, including some management personnel, are registered representatives of HESCO.

B. Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Adviser Registration Status

Hartford Investment Management has been registered with the Commodity Futures Trading Commission (CFTC) as a Commodity Trading Advisor since February 18, 2009.

C. Material Relationships or Arrangements with Industry Participants

Hartford Investment Management Company has material relationships or arrangements with the following industry participants:

1. Broker-dealer, municipal securities dealer, or government securities dealer or broker:

Hartford Investment Management is affiliated with HESCO, Hartford Securities Distribution Company, Inc. and Hartford Investment Financial Services, LLC ("HIFSCO"), each a registered broker-dealer, which serve as principal underwriters for registered variable annuity and variable life insurance contracts issued by Hartford Life Insurance Company and its affiliates, and affiliated mutual funds. Hartford Investment Management has no material business relationships with HIFSCO as a broker-dealer. Please see [Section C.3.](#) below for a description of Hartford Investment Management's material business relationship with HIFSCO. Hartford Investment Management is also affiliated with Woodbury Financial Services, Inc. ("WFS") and Hartford Life Distributors, LLC (f/k/a PLANCO Financial Services, LLC), both registered broker-dealers, which provide retail and institutional brokerage services and wholesaling support, respectively, for products sponsored by Hartford Investment Management affiliates. Certain employees of Hartford Investment Management are registered representatives of HESCO.

Although Hartford Investment Management has affiliated broker-dealers, pursuant to Hartford Investment Management's Prohibited Brokerage Arrangements Policy, the firm will execute transactions on behalf of its advisory clients only through brokers/dealers or other financial intermediaries that are not affiliated with Hartford Investment Management.

Moreover, pursuant to its Prohibited Brokerage Arrangements Policy, Hartford Investment Management is prohibited from: (a) agreeing, expressly or implied, to select a counterparty for a portfolio transaction to compensate it for recommending Hartford Investment Management as an investment adviser to prospective or existing clients; (b) directing any trade for any mutual fund or other client portfolio to a counterparty, or causing any counterparty to receive any remuneration such as a commission, mark up or fee in connection with any portfolio transaction as compensation for or in recognition of any promotion or sale of the shares of or interests in any mutual fund advised or sub-advised by Hartford Investment Management; (c) taking into account any counterparty's promotion or sale of the shares of or interests in any Fund in allocating portfolio transactions to counterparties; and (d) entering into any agreement (oral or

written) or other understanding under which Hartford Investment Management will or will seek to direct, (i) portfolio securities transactions, or (ii) any remuneration, including but not limited to any commission, mark-up, mark-down, step-out, or other fee (or portion thereof) received or to be received from an account's securities transactions effected through any other counterparty, to a counterparty in consideration for the promotion or sale of shares issued by any mutual fund advised or sub-advised by Hartford Investment Management.

2. Investment company or other pooled investment vehicle investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund):

Domestic mutual funds and foreign funds:

Hartford Investment Management subadvises certain U.S. mutual funds, each of which is a series of one of four U.S. registered open-end investment companies (Hartford Series Fund, Inc., Hartford HLS Series Fund II, Inc., The Hartford Mutual Funds, Inc. and The Hartford Mutual Funds II, Inc.) which are sponsored and distributed by affiliates. Hartford Investment Management also provides investment management services to several funds issued by The Hartford International Funds and The Hartford International Funds II, each an Irish umbrella unit trust, which is managed by The Hartford International Asset Management Company Limited, a limited liability company established under the laws of Ireland.

Other Pooled Investment Vehicles:

Hartford Investment Management is the co-manager of a private placement real estate mezzanine fund. The fund is comprised of structured products, debt investments and other investments related to commercial real estate assets and real estate operating companies, including, but not limited to, commercial mortgage loans and/or subordinate participations therein, with or without equity participating features, mezzanine loans secured by equity in a borrower which is the direct or indirect owner of income producing real estate, mortgage backed securities, loans for and other financing of redevelopment and construction of commercial properties, equity and debt investments in collateralized debt obligations, other securities and derivatives used for hedging purposes. Hartford Investment Management is a co-collateral manager of the issuer of a commercial real estate collateralized debt obligation that issued notes and preferred shares to finance the assets of the private placement real estate mezzanine fund and its REIT subsidiary.

Hartford Investment Management also manages a private placement fund of funds, a fixed income private placement investment fund, and a private placement trust with six series, all of which are exempt from registration pursuant to either Section 3(c)1 or Section 3(c)7 of the 1940 Act.

To the extent permitted by the Advisers Act, the Investment Company Act, ERISA and other applicable law, Hartford Investment Management's clients may invest in registered and unregistered pooled investment vehicles which are sponsored or advised by Hartford Investment Management or an affiliate of Hartford Investment Management, in which Hartford Investment Management and/or an affiliate of Hartford Investment Management have significant investments.

Because Hartford Investment Management acts as investment adviser or sub-advisor to numerous client accounts as well as registered and unregistered investment companies and other pooled investment vehicles, there are certain conflicts of interest inherent in such arrangements. While Hartford Investment Management will make decisions for its

clients' advisory accounts in accordance with its obligations to manage the accounts appropriately, the fees, compensation and other benefits which Hartford Investment Management receives arising from certain portfolio, investment, service provider or other decisions made by Hartford Investment Management may be greater than they would have been had other decisions been made which might also have been appropriate for such advisory accounts. Hartford Investment Management addresses this conflict through its Trade Allocation Policy and Procedures, which has the purpose of promoting fair and equitable treatment in terms of allocation of investment opportunities and trade executions for client accounts. Under its Trade Allocation Policy and Procedures, Hartford Investment Management must act primarily for its clients' benefit and ensure that over time, each client is treated fairly and equitably. One client may not be favored over another, and all transactions are subject to the overall standard of seeking to achieve best execution.

Please see additional disclosure under [Item 6](#) "**Performance-Based Fees and Side-By-Side Management**".

3. Other Investment adviser or financial planner:

Hartford Investment Management is affiliated with HL Investment Advisors, LLC ("HLIA") and Hartford Investment Financial Services, LLC ("HIFSCO"), both U.S. registered investment advisers, which serve as investment managers to several U.S. registered investment companies sponsored by affiliates of The Hartford. Hartford Investment Management is also affiliated with WFS, a U.S. registered investment adviser, which offers financial advice along with a broad range of financial products that include, but are not limited to general securities, load and no-load mutual funds, fixed and variable annuities, variable life insurance, REIT's and direct participation programs.

Please see also description of Hartford Investment Management's Prohibited Brokerage Arrangements Policy under [Section C.1.](#) of this **Item 10 "Other Financial Industry Activities and Affiliations."**

4. Futures commission merchant, commodity pool operator, or commodity trading advisor:

None

5. Banking or thrift institution:

None

6. Accountant or accounting firm:

None

7. Lawyer or law firm:

None

8. Insurance company or agency:

Hartford Investment Management is investment manager for the general accounts and certain separate accounts of certain affiliated U.S. and foreign based life and property and casualty insurance companies within The Hartford including American Maturity Life

Insurance Company, Champlain Life Reinsurance Company, Excess Insurance Company, Ltd., Fencourt Reinsurance Company, Ltd., First State Insurance Company, Hartford Accident and Indemnity Company, Hartford Casualty Insurance Company, Hartford Financial Products International Limited, Hartford Fire Insurance Company, Hartford Insurance Company of Illinois, Hartford Insurance Company of the Midwest, Hartford Insurance Company of the Southeast, Hartford International Life Reassurance Corporation, Hartford Life and Accident Insurance Company, Hartford Life and Annuity Insurance Company, Hartford Life Insurance Company, Hartford Life Limited, Hartford Life, Ltd, Hartford Lloyds Insurance Company, Hartford Underwriters Insurance Company, Heritage Reinsurance Company, Ltd., 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, Twin City Fire Insurance Company, and White River Life Reinsurance Company. Through its affiliation with The Hartford, Hartford Investment Management is also affiliated with other insurance companies, but has no material business relationships with such other entities.

Hartford Investment Management's investment activity for its affiliated advisory accounts may in certain circumstances limit the implementation of investment strategies for non-affiliated clients. For example, in certain regulated industries and in certain emerging or international markets, there may be limits on the aggregate amount of investment by affiliated investors which may not be exceeded without certain actions being taken. If such aggregate ownership thresholds are reached, Hartford Investment Management's ability to purchase or dispose of investments may be restricted accordingly. As a result, Hartford Investment Management may, in its discretion, limit purchases of certain investments, sell existing investments, or otherwise abstain from exercising certain rights (such as voting rights), if it deems it appropriate or necessary. In addition, exceeding other ownership thresholds may require governmental and regulatory reporting, which may require the disclosure of the identity of the advisory account holding the investment or the intended strategy regarding such investment, which could have an adverse impact on the price or liquidity of such security.

Although Hartford Investment Management will give advice to and make investment decisions for its clients as it believes is in the best interests of such clients, Hartford Investment Management may give advice and take action with respect to any funds or accounts it manages, including affiliated accounts, that may differ from action taken by Hartford Investment Management on behalf of other funds or accounts. Action taken with respect to a Hartford Investment Management client, including affiliated accounts, may itself adversely or beneficially impact other Hartford Investment Management clients. For example, Hartford Investment Management may purchase a security for one advisory account, and establish a short position in the same security for another advisory account. The subsequent short sale may impair the value of the security held in the first advisory account. Conversely, Hartford Investment Management may establish a short position in a security for one advisory account, and then purchase the same security for another advisory account. The subsequent purchase may increase the price of the underlying position in the short sale portfolio, to the detriment of that advisory account.

Hartford Investment Management is not obligated to recommend, buy or sell, or take any short position with respect to, or to refrain from recommending, buying or selling or taking any short position with respect to, any security that Hartford Investment Management, its affiliates or their respective access persons, as defined by the Advisers Act, may buy or sell for its or their own account or for the accounts of any other client. In addition, Hartford

Investment Management is not obligated to seek information or to make available to or share with any client any information, investment strategies or investment opportunities developed or used in connection with other clients, and Hartford Investment Management personnel may act on the basis of such information for certain portfolios in a manner that may have an adverse effect on other portfolios.

Pursuant to an investment management agreement with HIFSCO, Hartford Investment Management serves as sub-advisor to affiliated mutual funds and investment options available under variable annuity and variable life insurance contracts issued by Hartford Life Insurance Company.

Hartford Investment Management is not obligated to refrain from investing in securities held by funds or accounts that it manages (including seed money portfolios) except to the extent that such investments violate the Code of Ethics ("Code") adopted by Hartford Investment Management in accordance with Rule 204A-1 of the Advisers Act and Rule 17j-1 under the 1940 Act.

Transactions in investments by one or more Hartford Investment Management clients may have the effect of diluting or otherwise negatively impacting the values, prices or investment strategies of another Hartford Investment Management client, particularly (but not necessarily limited to) those in less liquid strategies such as small cap equities or emerging markets.

Please see additional disclosure under [Item 6](#) "**Performance-Based Fees and Side-By-Side Management**".

9. Pension consultant:

None

10. Real estate broker or dealer:

None

11. Sponsor or syndicator of limited partnerships:

See [Section 10.C.2.](#) above.

D. Material Conflicts of Interest Relating to Other Investment Advisers

Hartford Investment Management does not recommend or select other investment advisers for our clients.

ITEM 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

Hartford Investment Management has adopted a Code of Ethics which applies to all of its employees. Hartford Investment Management will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

The Code of Ethics is predicated upon the following principles: (1) interests of investment company shareholders and advisory account clients shall at all times be placed ahead of the interest of Hartford Investment Management or its employees; (2) personal securities transactions shall be conducted in such a manner as to manage or mitigate any actual or apparent conflict of interest, or any abuse of an individual's position of trust and responsibility; and (3) personnel shall never take inappropriate advantage of their positions. It further provides that all employees must comply with all applicable federal securities laws and the Code of Ethics and Business Conduct of The Hartford. Among its most significant provisions, it imposes certain trading restrictions on certain persons who are likely to know about Hartford Investment Management's trading activity. Included in these restrictions, there are prohibitions on the purchase of equity securities in initial public offerings, and - except for non-Hartford mutual funds, government securities, managed accounts, high quality money market investments and a limited number of certain highly liquid ETFs and currencies – employees are required to pre-clear their securities transactions prior to execution. In addition, there is a sixty (60) day holding requirement, a one (1) day blackout period for employees and a fourteen (14) day blackout period for certain investment personnel. Also, employees will be required to maintain certain of their personal accounts with designated broker-dealers (exemptions may be granted on a case-by-case basis) to facilitate electronic receipt of trade confirmations and account statements, and may not engage in excessive personal trading (which is generally defined as more than 10 pre-cleared trades per quarter). The Code of Ethics also addresses issues such as political contributions, market timing, late trading, gifts and entertainment, service on boards of directors and outside business activities.

The Code of Ethics requires all employees of Hartford Investment Management to submit quarterly reports of transactions in accounts in which they or their immediate family members have a beneficial interest. In addition, all employees of Hartford Investment Management must submit annual reports of their holdings.

B. Securities that Hartford Investment Management or a Related Person Has a Material Financial Interest In

From time to time Hartford Investment Management, or any related person or any of their respective employees or principals may have a material financial interests in securities owned by or recommended to clients of Hartford Investment Management. For example, such parties may (1) purchase interests in funds or other private investment vehicles (e.g., Hartford Investment Management's real estate mezzanine fund is authorized to accept up to an aggregate of \$2 million of capital commitments (which represents less than 1% of the capital commitments of HMI) from certain senior executives of Hartford Investment Management) managed by Hartford Investment Management or its related persons, (2) invest in mutual funds advised or subadvised by Hartford Investment Management or its related persons, or (3) participate in Hartford's Voluntary Employees Beneficiary Association, an ERISA retirement benefit plan, "The Excess Benefit Trust", a "Top Hat" plan for certain senior executives of The Hartford that invests in highly liquid short-term corporate paper and short-term floaters. Such investments may not be balanced among funds or strategies and accordingly, these situations may give rise to potential conflicts of interests since an employee of Hartford Investment Management may have an economic interest in maximizing performance in a fund or account in which they are invested. Potential conflicts could also occur if Hartford Investment Management engages in transactions with any entities which hold significant

interests in The Hartford. Any such transactions will be conducted in compliance with the requirements of the Advisers Act and the 1940 Act, as applicable.

Pursuant to an investment management agreement with HIFSCO, Hartford Investment Management serves as sub-advisor to affiliated mutual funds and investment options available under variable annuity and variable life insurance contracts issued by Hartford Life Insurance Company.

C. Securities that Hartford Investment Management or a Related Person Has a Material Financial Interest In

From time to time Hartford Investment Management, or any related person or any of their respective employees or principals may invest in the same securities owned by or recommended to clients of Hartford Investment Management. Hartford Investment Management is not obligated to recommend, buy or sell, or take any short position with respect to, or to refrain from recommending, buying or selling or taking any short position with respect to, any security that Hartford Investment Management, its affiliates or their respective access persons, as defined by the Advisers Act, may buy or sell for its or their own account or for the accounts of any other client. In addition, Hartford Investment Management is not obligated to seek information or to make available to or share with any client any information, investment strategies or investment opportunities developed or used in connection with other clients, and Hartford Investment Management personnel may act on the basis of such information for certain portfolios in a manner that may have an adverse effect on other portfolios. Hartford Investment Management is not obligated to refrain from investing in securities held by funds or accounts that it manages (including seed money portfolios) except to the extent that such investments violate the Code of Ethics adopted by Hartford Investment Management in accordance with Rule 204A-1 of the Advisers Act and Rule 17j-1 under the 1940 Act.

Hartford Investment Management has adopted policies and procedures relating to personal securities transactions and insider trading that are designed to mitigate actual conflicts of interest. Under Hartford Investment Management's Code of Ethics, the firm's employees and other access persons are subject to a one day blackout period which prohibits them from purchasing or selling a security for a personal account on the same day in which the firm transacts in that security in an advisory account. In addition, the firm's investment professionals are subject to a fourteen day blackout restriction which prevents them buying or selling a security within seven calendar days before or seven calendar days after the same security is trading for an advisory account. The fourteen day blackout restriction is limited to the types of securities that the investment professional's business unit purchases for advisory accounts. All securities that are part of the S&P 100 Index (generally the largest and most established companies in the S&P 500 Index) are exempt from the one day and fourteen day blackout period restrictions.

D. Conflicts of Interest Created by Contemporaneous Trading

Hartford Investment Management may from time to time purchase or sell securities owned by affiliated clients from or to unaffiliated clients. All such transactions are conducted in accordance with Section 206-(3) of the Advisers Act and Hartford Investment Management's policies. Hartford Investment Management discloses the capacity in which it is acting and the material terms of the transaction and obtains the consent of the clients involved prior to settlement.

To the extent permitted by applicable law, Hartford Investment Management may from time to time effect "cross transactions" (where Hartford Investment Management causes an advisory account to buy a security from, or sell a security to, another client of Hartford Investment Management). Hartford Investment Management may have a conflict regarding both parties in a cross transaction, where it represents an advisory account on one side of the transaction and another advisory account on the other side of the transaction (including affiliated accounts). Cross transactions will be effected on commercially

reasonable terms and Hartford Investment Management will, to the extent required by applicable law, obtain necessary consents prior to entering into principal transactions prior to settlement.

In addition, Hartford Investment Management may from time to time engage in the “netting” of foreign exchange transactions. In this context, a “netted” trade consists of executing offsetting buy and sell orders in the same instrument, with the same dealer, at more or less the same time. Under certain circumstances, such transactions could be viewed as indirect cross trades. There may also be circumstances in which Hartford Investment Management may engage in the “netting” of Treasury bonds, although our practice is not to do so.

Hartford Investment Management manages a large portfolio for its affiliated accounts and thus, in the ordinary course of business, may compete with its other clients in the market for securities. Please see [Item 12](#) **“Brokerage Practices – Order Aggregation”** below for a discussion of policies and procedures Hartford Investment Management uses to address pertinent conflicts of interest.

Although Hartford Investment Management has affiliated broker-dealers, pursuant to Hartford Investment Management’s Prohibited Brokerage Arrangements Policy the firm will execute transactions on behalf of its advisory clients only through brokers/dealers or other financial intermediaries that are not affiliated with Hartford Investment Management.

Hartford Investment Management will resolve the foregoing conflicts on a case-by-case basis, taking into account the interests of the relevant clients, the circumstances under which the conflict arose, and applicable laws. Nonetheless, clients of Hartford Investment Management (and investors in private funds sponsored by or advised by Hartford Investment Management) should be aware that conflicts will not necessarily be resolved in favor of their interests, and that there can be no assurance that any actual or potential conflicts of interests will not result in a particular client of Hartford Investment Management receiving less favorable investment terms in certain investments than if such conflicts did not exist.

ITEM 12: BROKERAGE PRACTICES

A. Factors Hartford Investment Management Considers in Selecting or Recommending Broker-Dealers for Client Transactions and Determining the Reasonableness of their Compensation

Hartford Investment Management fulfills its best execution duty by placing transactions on behalf of a client with the goal of maximizing value for the client under the particular circumstances occurring at the time of the transaction. Hartford Investment Management will seek, on behalf of its clients, the most favorable execution under the circumstances for every transaction and that often includes seeking the best price.

Traders are not necessarily required to choose the counterparty offering the best price if, in their reasonable judgment, based on the consideration of factors such as those listed below, there is a material risk that the total qualitative level of execution provided by such counterparty might be less favorable than may be obtained elsewhere. Moreover, traders may or may not elect to solicit competitive bids or offers for a particular transaction based on their judgment of the potential benefit or harm to the execution of that transaction.

In general, in selecting counterparties to execute a trade, Hartford Investment Management will consider in addition to price, factors that are transaction and counterparty specific. It is understood that different factors will have different levels of importance with each order, as each order is unique. Hartford Investment Management will evaluate each order and assess which competing markets, market makers, or electronic communication networks (ECNs) offer the most favorable execution.

When making the best execution determination, Hartford Investment Management will, depending on the circumstances consider multiple factors when choosing a counterparty such as (but not limited to) size and difficulty of order, block trading and execution capabilities, capital strength and integrity, ability and willingness to commit capital, reliable and accurate communication and settlement processing, and research. It is understood that best execution practices may vary depending on the type of security or loan being transacted, the type of transaction being executed, the size of the trade, and the prevailing market conditions, and that different factors will have different levels of importance with each order.

Trades may only be executed with counterparties that have been placed on Hartford Investment Management's list of approved broker-dealers. Approved counterparties are included in the trade order management applications and are reviewed periodically. Hartford Investment Management uses broker-dealers with demonstrated service capabilities (e.g., market knowledge and presence, financial strength and stability, ability and willingness to position trades, block trading coverage, effective settlement processing, and research), and monitors its broker-dealer relationships, market conditions, the quality of trade execution and services, and emerging trends and innovations.

Hartford Investment Management's relationships with counterparties, and in particular with those counterparties who are affiliated with large financial services organizations, may be complex. In addition to Hartford Investment Management's trading relationships with such counterparties, Hartford Investment Management may also have other relationships with them, including without limitation: (a) investing client assets in securities issued by broker-dealers or their affiliates; (b) providing investment management services to certain broker-dealers or their affiliates; (c) utilizing such broker-dealers or their affiliates as counterparties for derivatives transactions; and (d) utilizing certain broker-dealers or their affiliates as prime brokers.

Hartford Investment Management is mindful of the potential conflicts of interest that may exist when executing client transactions and has set forth the following prohibited practices: trades may not be directed to counterparties in return for covering the cost of error corrections, trades may not be directed in

return for suggested preferential treatment in new issues, IPOs, or other placements, trades may not be directed in return for gifts and entertainment, trades may not be directed in return or recognition of client referrals, and trades must not be influenced by any personal conflict such as a family relationship with an employee or owner of a counterparty. Although Hartford Investment Management has affiliated broker-dealers, pursuant to Hartford Investment Management's Prohibited Brokerage Arrangements Policy the firm will execute transactions on behalf of its advisory clients only through brokers/dealers or other financial intermediaries that are not affiliated with Hartford Investment Management.

Hartford Investment Management periodically and systematically monitors its trade execution to assess its effectiveness in obtaining best execution. The analysis includes a review of counterparty volume reports and ranking reviews, commission or imputed revenues and transaction analysis. Where available Hartford Investment Management may use third party vendor analysis.

It is Hartford Investment Management's policy to treat its clients fairly and equitably. In accordance with its Trade Error Correction Policy, Hartford Investment Management will assess and determine when a trade error has occurred and will reimburse its clients for losses incurred. The amount and methodology used to calculate reimbursements may be based on a variety of factors including but not limited to benchmarks and other market factors.

Pursuant to Hartford Investment Management's Trade Error Correction Policy all trade errors must be reported and documented as soon as practicable after discovery of the error and corrective action must be taken in a timely and prudent manner.

1. Research and Other Soft Dollar Benefits:

A broker-dealer will often provide products and services to investment advisers in order to give the adviser additional incentives to direct client brokerage transactions to the broker-dealer. 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 are obtained by an adviser from or through a broker-dealer in exchange for the direction of client brokerage transactions to the broker-dealer."¹ Typically, an adviser receives brokerage or research products or services (brokerage or research) from a broker-dealer and "pays" for the brokerage or research with commissions from transactions for advisory accounts. The commissions used to pay for the brokerage or research are referred to as soft dollars. Advisers may also receive brokerage or research which is provided on a "bundled" basis with trade execution. Even if an adviser does not pay a separately identifiable fee for the "bundled" brokerage or research, the receipt of "bundled" brokerage or research may under certain circumstances be characterized as a soft dollar arrangement.

When an investment adviser uses client commissions to pay for brokerage or research, the adviser receives a benefit because it does not need to produce or pay for the brokerage or research itself. Moreover, the brokerage or research received may not necessarily benefit the client whose commissions were used to pay for it – it may instead exclusively benefit other clients. Additionally, when transactions involving soft dollars involve the adviser paying higher commission rates (sometimes referred to as "paying up"), advisers using soft dollars face a conflict of interest between their need to obtain brokerage or research and their requirement to seek the best possible execution for their clients. As such, the use of client commissions and client transactions to pay for brokerage or research presents advisers with significant conflicts of interest by creating an incentive for advisers to disregard their best execution obligations when directing orders in order to obtain brokerage and research, as well as to trade client securities inappropriately in order to earn credits for such brokerage and research.

¹ See Office of Compliance, Inspections and Examinations, SEC, Inspection Report on the Soft Dollar Practices of Broker-Dealers, Investment Advisers and Mutual Funds § II.B. (September 22, 2998) ("1998 Soft Dollar Study").

Hartford Investment Management does not currently utilize any formal soft dollar arrangements, and Hartford Investment Management's Investment Personnel (as such term is defined in Hartford Investment Management's Code of Ethics) are prohibited from entering into formal soft dollar arrangements on Hartford Investment Management's behalf (in this context, the term "formal soft dollar arrangement" is defined as any agreement with a broker-dealer, either oral or written, whereby soft dollar credits or brokerage or research are provided to Hartford Investment Management in exchange for directing client brokerage transactions to the broker-dealer).

"Bundled Products and Services"

Hartford Investment Management receives brokerage and research products and services from some of its approved broker-dealers, which are often "bundled" with the trade execution services provided by the broker-dealers. Such products and services are referred to as "Bundled Products and Services".

Use of Proprietary Bundled Products and Services Permitted

So long as they are proprietary in nature (e.g., have been produced by the broker-dealer providing them and not by a third-party other than such broker-dealer), then Hartford Investment Management's Investment Personnel may utilize such Bundled Products and Services ("Proprietary Bundled Products and Services") without restriction.

Use of Third-Party Bundled Products and Services Prohibited Without Prior Approval

Hartford Investment Management's Investment Personnel may not accept Bundled Products and Services from a broker-dealer if those Bundled Products and services are produced by an entity other than such broker-dealer ("Third Party Bundled Products and Services") unless 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 his/her respective designees).

- a. To the extent Hartford Investment Management does obtain research or other product or services in connection with brokerage commissions, Hartford Investment Management benefits because we do not have to produce or pay for such research, products or services.
- b. Hartford Investment Management may have an incentive to select or recommend a broker-dealer based on its interest in receiving such bundled services rather than based on our Client's interest in receiving most favorable execution. Since the broker-dealer selected may not be the lowest cost, Hartford Investment Management may be deemed to be "paying up."
- c. As noted above, although Hartford Investment Management is not currently a party to any explicit soft dollar arrangements with third party broker-dealers, Hartford Investment Management does receive bundled services from some of its approved broker-dealers. Even though Hartford Investment Management does not pay a separately identifiable fee for such bundled services, the receipt of such bundled services may still be characterized by the SEC as a soft dollar arrangement.
- d. As noted above, Hartford Investment Management is not currently a party to any explicit soft dollar arrangements with third party broker-dealers, although Hartford Investment Management does receive bundled services from some of its approved broker-dealers. Hartford Investment Management does not seek to

allocate benefits proportionately; rather, the benefit of these bundled services are used to service all of Hartford Investment Management's clients' accounts and is not limited to the client accounts whose brokerage gave rise to the receipt of the bundled services.

- e. As noted above, Hartford Investment Management is not currently a party to any explicit soft dollar arrangements with third party broker-dealers, although Hartford Investment Management does receive bundled services from some of its approved broker-dealers. The following bundled services received within Hartford Investment Management's last fiscal year were: (i) access to research reports; (ii) access to research analysts; (iii) access to issuer management; (iv) access to algorithmic trading software; (v) access to analytical tools (such as modeling tools); (vi) access to research websites; (vii) advice on order execution; (viii) access to on-site research presentations; (ix) access to seminars and conferences; and (x) access to relationship building events.
- f. As noted above, Hartford Investment Management is not currently a party to any explicit soft dollar arrangements with third party broker-dealers. Although Hartford Investment Management does receive bundled services from some of its approved broker-dealers, Hartford Investment Management does not direct traded to a broker-dealer "in return for" soft dollar benefits.

2. Brokerage for Client Referrals

As noted above, Hartford Investment Management's Prohibited Brokerage Arrangements Policy prohibits Hartford Investment Management from agreeing, expressly or implied, to select a counterparty for a portfolio transaction to compensate it for recommending Hartford Investment Management as an investment adviser to prospective or existing clients.

3. Client Directed Brokerage

- a. Hartford Investment Management generally selects broker-dealers to execute securities transactions. Hartford Investment Management does not recommend, request or require that a client direct the firm to execute transactions through a specified broker-dealer.
- b. From time to time and in limited instances, clients may direct the firm to use particular broker-dealers to execute their securities transactions. Additionally governmental entities may mandate that advisers use certain broker-dealers when executing transactions for accounts domiciled in particular jurisdictions.

Normally, Hartford Investment Management will select broker-dealers based on its assessment of the execution capabilities and quality of such broker-dealers and its obligation to seek most favorable execution under the circumstances for each transaction. Hartford Investment Management will consider selecting broker-dealers identified by the client if such request is supported by a written request. Hartford Investment Management may advise clients that directing it to use a particular broker-dealer to execute transactions for their accounts may result in: (1) higher transaction costs for the client; (2) reduce the firm's flexibility in securing most favorable execution; (3) that a client who directs Hartford Investment Management to use a specific broker may forego any benefits from savings on execution costs that Hartford Investment Management could obtain for its clients through negotiating volume discounts on batched

transactions; (4) that a client who directs Hartford Investment Management to use a specific broker may not be able to participate in a new issue if that new issue is provided by another broker; (5) Hartford Investment Management may not begin to execute client securities transactions with broker-dealers which have been directed by clients until all non-directed brokerage orders are completed; and (6) the accounts of clients directing broker-dealers may not generate returns equal to clients that do not direct broker-dealers.

Hartford Investment Management will not direct trades to any broker-dealer as compensation for or in recognition of any promotion or sale of shares of or interests in mutual funds, unregistered funds, or separately managed accounts.

B. Order Aggregation

Hartford Investment Management may aggregate portfolio management orders into a single order (absent specific client direction to the contrary) when it determines that it is consistent with best execution and in the best interests of the clients. It is the policy of Hartford Investment Management that when a decision is made to aggregate transactions on behalf of more than one account, such transactions will be allocated to all participating client accounts in a fair and equitable manner. Such combined or "batched" trades may be used to facilitate best execution including negotiating more favorable prices, obtaining more timely or equitable execution or reducing overall transactions costs. Hartford Investment Management may include affiliated accounts in such aggregated trades. Equity trades will carry the average dollar weighted execution price. Due to the nature of the over-the-counter (OTC) fixed income market (with limited liquidity among different counterparties and no centralized exchange), the concept of average dollar weighted execution price does not apply to fixed income trades. Hartford Investment Management will not receive additional compensation or remuneration as a result of block transactions.

Generally, before entering an order, Hartford Investment Management portfolio managers will prepare a written statement specifying the participating client accounts and how the order is intended to be allocated. There may be times where the order and execution occur at the same time, and requiring pre-trade documentation may prevent the ability to participate in a batched order. In those instances, the written order must be completed immediately after the transaction is completed. When deciding which client accounts to include in a batch order, the portfolio managers will consider one or more of the following factors: investment strategy, client guidelines, cash flow changes, risk tolerances, the significance of the allocation relative to the size of the participating accounts, and current weightings of similar holdings among the participating accounts. If the order is filled in its entirety, it will be allocated between or among client accounts in accordance with the allocation statement. If the traders cannot completely fill the order due to current trading activity, the order will be allocated pro rata between or among client accounts based on the allocation statement, rounded to the appropriate round lot size.

Exceptions

An inflexible policy may not be appropriate in all circumstances, and may not always result in the fair and equitable treatment of all clients. Throughout the day traders will inform the portfolio managers of market conditions and security availability enabling portfolio managers to amend their orders. If pro-rata allocation is impracticable, the portfolio manager will review the initial allocation to determine the best course of action.

Once trades are executed, they may be reallocated only in limited circumstances and only upon review and approval by senior management and the Compliance Department.

ITEM 13: REVIEW OF ACCOUNTS

A. Frequency and Nature of Review of Client Accounts or Financial Plans

Hartford Investment Management periodically reviews all accounts. Members of the Investment Management Compliance team in Hartford Investment Management's Compliance Department are responsible for performing these reviews.

Each investment advisory account is assigned to a portfolio manager who has overall responsibility for ensuring that transactions and holdings within client accounts are in compliance with investment guidelines and regulatory requirements. The Compliance Department assists and supports the portfolio manager's efforts by conducting transactional, periodic, and forensic surveillance activities to monitor and assess such adherence.

Hartford Investment Management compliance monitoring activities function at both the pre-trade and post-trade level. These applications generally allow the automation of concentration limits and security attributes. Prior to initiating a new account and periodically thereafter, Compliance reviews the accounts' controlling documents with the Portfolio Management and Legal teams and codes the client and statutory restraints into the appropriate applications.

On a daily basis automated reports provide timely notification to the Compliance Department and to Portfolio Management should a trade or holding approach or exceed an account's investment guideline and/or regulatory requirement (manual testing is used for those constraints which cannot be tested in an automated fashion).

The Compliance Department is responsible for researching and determining the validity of each violation notification. If validated, the Compliance Department informs Portfolio Management that actions must be taken to remedy the violation and documents each breach, the cause, and resolution. Compliance provides senior management with periodic summary details.

Client guideline compliance and review is an ongoing process and the team will tailor client accounts on a customized basis if there are areas within the general guidelines that are not suitable for a given client. Hartford Investment Management's Compliance group has designed and implemented compliance tests which run pre-trade, post-trade, post-confirmation and batch. Non-batch test routines address an asset's suitability to a particular portfolio based upon the portfolio's constraints as identified in a prospectus, statement of additional information, and investment management agreements. The pre-trade test functionality provides a means for the portfolio manager to ensure the asset's suitability for the portfolio prior to issuing a trade order to the trading desk.

B. Factors Prompting Review of Client Accounts Other than a Periodic Review

Factors which may prompt review of client accounts on an other than periodic basis include: (1) regulatory changes that may impact the management of an account; (2) the occurrence of a trade error (which may trigger an investigations of the relevant client guidelines in order to confirm whether a particular security was eligible to be held in the account); (3) changes to client guidelines (in terms of reviewing the impact of the change on the investible universe of securities for the account); (4) the evolution of new security types in the marketplace (in terms of the investigation that would be done to see whether those new security types are included in the guidelines' definition of the eligible universe for that account); (5) trade allocation review (in terms of determining whether a given account would have been eligible to participate in a given order); and (6) performance dispersion review (in terms of the review undertaken to determine causation following the occurrence of a material amount of performance dispersion between an account and other accounts with the same investment strategy).

C. Content and Frequency of Account Reports to Clients

Each client receives formal written reports at least annually but most accounts have monthly or quarterly reports. Reports normally include actual performance, performance against objectives, comments on markets and strategy and any suggested changed in performance objectives. Due to the variety of managed accounts, reporting may be customized to meet client needs.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. Economic Benefits for Providing Services to Clients

Other than certain “bundled services” described under [Item 12](#) “**Brokerage Practices**,” Hartford Investment Management does not receive any economic benefits from persons who are not Clients in exchange for providing advisory services to our Clients.

B. Compensation to Non-Supervised Persons for Client Referrals

From time to time, Hartford Investment Management or its affiliates may pay investment consultants or their parent or affiliated companies for certain services including industry data services, technology, operations, tax, or audit consulting services, and/or may pay such firms for Hartford Investment Management’s attendance at investment forums, conferences or seminars or for various studies, surveys, or access to databases. Hartford Investment Management or its affiliates may also provide investment advisory services to investment consultants and/or their affiliates. These investment consultants and/or their affiliates may, in the ordinary course of their investment consultant business, recommend Hartford Investment Management’s services or products sponsored by Hartford Investment Management and/or its affiliates to their clients. To this end, Hartford Investment Management from time to time provides information about its various investment styles to investment consultants, who may use that information in connection with searches they conduct for their clients. Hartford Investment Management also from time to time responds to requests for proposals and requests for information received from investment consultants in connection with such searches.

Hartford Investment Management reserves the right to enter into arrangements pursuant to which certain unaffiliated persons and entities may be compensated, directly or indirectly, for referring clients to Hartford Investment Management. To the extent deemed applicable, such arrangements will be entered into in accordance with the terms and conditions of Rule 206(4)-3 under the Advisers Act. Clients will be advised of the nature of these arrangements prior to the time of the referral. Please see [Section E.2](#) of **Item 5** for a general description of Hartford Investment Management’s Solicitation Policy.

ITEM 15: CUSTODY

Given its relationship to certain private funds described in [Section C.2](#) of Item 10 “Other Financial Industry Activities and Affiliations”, Hartford Investment Management is in a position to directly access the accounts of such private funds and, as such, is deemed to have “custody” over such accounts as defined in Rule 206(4)-2 (the “Custody Rule”) under the Investment Advisers Act of 1940, as amended (the “Advisers Act”). Hartford Investment Management will generally provide investors in such private funds with audited financial statements for such private funds within 120 days after the end of such private fund's fiscal year (180 days for funds which are “funds of funds” as defined for purposes of the Custody Rule).

Except as described above, Hartford Investment Management does not have custody of client funds or securities.

ITEM 16: INVESTMENT DISCRETION

Hartford Investment Management accepts discretionary authority to manage securities accounts on behalf of clients. Hartford Investment Management does provide investment management services to several non-discretionary accounts as well. Please see [Item 4](#) “**Description of Advisory Business.**”

ITEM 17: VOTING CLIENT SECURITIES

A. Policies and Procedures Relating to Voting Client Securities

Hartford Investment Management has authority to vote client securities and, accordingly, has adopted written proxy voting policies and procedures as required by Rule 206(4)-6 under the Advisers Act. These policies and procedures are designed to ensure that proxies are voted in the best economic interest of Hartford Investment Management's clients and in accordance with Hartford Investment Management's fiduciary duties. Please note that Hartford Investment Management will only vote those proxies for which it has proxy-voting authority.

Hartford Investment Management has retained Glass Lewis to assist with and to facilitate the proxy voting process. Glass Lewis is an independent proxy voting firm that specializes in providing a variety of fiduciary-level proxy advisory and voting services. The services provided to Hartford Investment Management include in-depth research, analysis and voting recommendations as well as vote execution, reporting, auditing and consulting assistance for the handling of proxy voting responsibility and corporate governance-related efforts.

Under the arrangement with Glass Lewis, Hartford Investment Management generally has delegated the responsibility for effecting its advisory clients' proxy votes to Glass Lewis. Hartford Investment Management pays for the services of Glass Lewis and does not use soft dollars to pay for any portion of the proxy services.

Proxy voting is a rare event in fixed income investing and is typically limited to solicitation of consent to changes in features of debt securities, including but not limited to plans of reorganization, and waivers and consents under applicable indentures.

As a general matter, all proxy proposals are voted in accordance with Glass Lewis's recommendations unless a Hartford Investment Management portfolio manager objects thereto. In addition, if a Hartford Investment Management client who has authorized Hartford Investment Management to vote proxies on its behalf wishes for Hartford Investment Management to vote its proxy in a fashion different from Glass Lewis's recommendation with respect to such vote, Hartford Investment Management will vote the proxy in accordance with the client's written instructions.

The proxy voting policies and procedures are designed to prevent material conflicts of interest from affecting the manner in which Hartford Investment Management votes its clients' proxies. In order to ensure that all material conflicts of interest are addressed appropriately while carrying out its obligation to vote proxies, Hartford Investment Management's Proxy Committee is responsible for addressing how Hartford Investment Management resolves such material conflicts of interest with its clients.

As noted above, all proxy proposals are voted in accordance with Glass Lewis's recommendations unless a Hartford Investment Management portfolio manager objects thereto or a Hartford Investment Management client who has authorized Hartford Investment Management to vote proxies on its behalf wishes for Hartford Investment Management to vote its proxy in a fashion different from Glass Lewis's recommendation with respect to such vote. In the case of an objecting portfolio manager, the portfolio manager must submit a written proposal to the Proxy Committee supporting his or her objection. The Compliance Department will then conduct an investigation to determine whether any conflicts of interest exist between Hartford Investment Management or the portfolio manager and any of the clients holding the security in question and will report its findings to the Proxy Committee. The Proxy Committee will then determine whether or not a material conflict exists and, if not, the portfolio manager will be permitted to override Glass Lewis' voting recommendations. If a material conflict of interest is found to exist, the Proxy Committee will reject the portfolio manager's objection and vote the proxy in accordance with Glass Lewis' recommendation. From time to time, Glass Lewis may not cover certain issuers, most commonly

certain foreign-based issuers. With respect to any proxy proposal where Glass Lewis has no recommendation, Hartford Investment Management can either request that Glass Lewis perform sufficient research to enable it to render a recommendation or the proxy will be voted by the portfolio manager or referred to the client whose account holds the securities.

Glass Lewis has implemented Conflict Avoidance Procedures in order to help prevent conflicts of interest from arising between an issuer and Glass Lewis. Under these Conflict Avoidance Procedures, Glass Lewis has implemented a number of conflict management procedures, including that: (a) Glass Lewis will not provide consulting services to public companies, other than (in limited cases) providing research and vote recommendations to an investment manager that is a public company or a division of a public company (but any such investment manager will only receive the same Glass Lewis Proxy Paper research report as is delivered in the ordinary course to all other clients), and in such situations Glass Lewis will make specific and prominent disclosure to its other customers about the relationship by adding a note to the relevant research report; (b) maintaining a wall between Glass Lewis' parent company, Ontario Teachers Pension Plan ("OTPP"), and Glass Lewis with respect to the review, development and implementation of Glass Lewis' proxy voting and corporate governance policies and procedures and, in instances where Glass Lewis provides coverage on a company in which OTPP has a publicly disclosed ownership stake, adding a note indicating such to the relevant research report; and (c) requiring any employee who serves as an executive or director of a public company to disclose the conflict and abstain from any involvement in the research, analysis or making of any vote recommendations for such company.

Copies of the proxy voting policies and procedures as they may be updated from time to time are available to clients upon request. Clients may also obtain information on how their proxies were voted by Hartford Investment Management. Clients can call their client service representative to obtain copies of these reports. The proxy records for Investment Companies are disclosed to shareholders via publicly-available annual filings.

Class Actions and Similar Matters

Hartford Investment Management may (but is generally not obligated to) advise or act for its clients in any legal proceedings, including bankruptcies or class actions, involving securities or other assets held in their accounts or issuers of those securities. In this regard, Hartford Investment Management may notify custodians or clients of shareholder class action lawsuits and similar matters pertaining to securities or other assets held or that were held in advisory accounts. However, Hartford Investment Management is not responsible for any failure to make any such filings or (if it elects in its sole discretion to make such filings) to make such filings in a timely manner. With respect to bankruptcies or workouts involving issuers of securities held in advisory accounts, Hartford Investment Management may in its discretion elect to participate in bankruptcy proceedings and join creditors committees on behalf of some or all of its clients, and/or elect to participate in workout negotiations and join formal or informal steering committees on behalf of some or all of its clients, but has no obligation to do so and is not responsible for any failure to do so.

ITEM 18: FINANCIAL INFORMATION

A. Balance Sheet

Hartford Investment Management does not produce standalone balance sheets. Its financial reporting is consolidated with its parent company, The Hartford Financial Service Group, Inc., a publicly traded corporation listed on the New York Stock Exchange.

B. Financial Conditions Likely to Impair Ability to Meet Contractual Commitments to Clients

Hartford Investment Management is not aware of any financial condition that is reasonably likely to impair the firm's ability to meet contractual commitments to Clients.

C. Bankruptcy Filings

Hartford Investment Management has not been the subject of a bankruptcy petition at any time during the past ten years.