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This Brochure provides information about the qualifications and business practices of Hartford Funds Management Company, LLC (“HFMC”). If you have any questions about the contents of this Brochure, please contact: Rita Rauscher, at 610-386-7374 or by email at: rita.rauscher@hartfordfunds.com.

HFMC is a registered investment adviser (“Adviser”). Registration does not imply a certain level of skill or training.

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 HFMC will also be available on the SEC’s website at www.adviserinfo.sec.gov

Item 2 – Material Changes

This Item only identifies and discusses material changes to Form ADV Part 2A. HFMC is required to disclose material changes to its organization or investment business since the Firm’s last annual update on March 31, 2014.

Revised Accounting and Sub-Administration Agreements

Effective January 1, 2015 and March 1, 2015, HFMC has entered into revised Accounting Agreements and Sub-Administration Agreements to outsource certain fund accounting and administrative services. The agreements permit HFMC to delegate various fund accounting and administration services to a sub-agent. HFMC has selected State Street Bank and its affiliates (“State Street”) to provide those fund accounting and administration services as sub-agent. HFMC has retained certain services and is responsible for managing State Street’s performance and completing necessary due diligence.

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Item 4 – Advisory Business

HFMC is registered with the SEC as an investment adviser and with the CFTC as a commodity pool operator. HFMC is an indirect subsidiary of The Hartford Financial Services Group, Inc. (“The Hartford”), a publicly traded financial services company based in Connecticut.

HFMC provides discretionary investment advisory services to Hartford Funds, which are SEC-registered open-end investment companies (collectively, Hartford Funds” and each series of which is a “Hartford Fund”)¹ and certain Cayman Islands private funds for which HFMC or an affiliate serves as general partner.² Certain of the Hartford Funds offer their shares at net asset value directly to variable annuity and variable life insurance separate accounts of Hartford Life Insurance Company and its affiliates (collectively “Hartford Life”), to other insurance company separate accounts and directly and indirectly to certain qualified employee benefit plans.

HFMC also provides non-discretionary investment advisory services to college savings “529” plans (“529 Plans”) for which HFMC’s affiliate Hartford Life Insurance Company (“HLIC”) provides plan management services. The 529 Plans offer portfolios that are investment options for the 529 Plans (each a “529 Portfolio”); the 529 Portfolios invest in one or more mutual funds, including certain Hartford Funds.

HFMC generally operates using a manager of managers or sub-advisory structure under which day to day portfolio management occurs at the sub-advisory level. HFMC is responsible for management and investment oversight of the sub-advisers hired by HFMC as well as providing administrative services including among other services, compliance, legal, governance and other activities required by Hartford Funds. In addition, HFMC serves as adviser to the Hartford Growth Allocation Fund and Hartford Checks and Balances Fund which invest in shares of other Hartford Funds. Investment

¹ The Hartford Mutual Funds, Inc., The Hartford Mutual Funds II, Inc., Hartford Series Fund, Inc., HLS Series Fund II, Inc., and the Hartford Alternative Strategies Fund, Inc., are combined to form Hartford Funds.

² The Cayman Funds are wholly-owned subsidiaries of the Hartford Global All Asset Fund and the Hartford Real Asset fund, each a Hartford Fund. The Cayman Funds are not offered to the public. Their sole purpose is to enable the Hartford Global All Asset Fund and the Hartford Real Asset Fund to gain exposure to commodity-linked instruments.

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advisory and administrative services are tailored to each Hartford Fund based on the investment objectives and strategies disclosed in its prospectus or, to each 529 Portfolio, in accordance with the requirements of the 529 Plan's Trust.

As of December 31, 2014, HFMC managed \$93.1 billion on a discretionary basis and \$924 million on a non-discretionary basis.

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Item 5 – Fees and Compensation

Advisory Fees

HFMC receives fees for its services to Hartford Funds including among others, investment management and administrative services. These fees are negotiated and approved by each Hartford Fund's Board of Directors (the "Board") initially for two years and subsequently subject to re-approval at least annually thereafter. Advisory fees for each Hartford Fund are generally based on a stated percentage of the Fund's average daily net assets. This stated percentage may be subject to an expense waiver and or reimbursement arrangement for that Hartford Fund as agreed upon by HFMC. HFMC charges The Hartford Global Alpha Fund a performance fee based on the Fund's performance relative to a securities market index. Each Hartford Fund pays HFMC after the last day of each month for HFMC's services; fees are deducted directly from each Hartford Fund's custodian account. The current fee schedule for each Hartford Fund is disclosed in that Hartford Funds' SEC registration statement and via www.hartfordfunds.com.

Fees calculated for a period of time that are less than a month are calculated at the annual rates provided in the Hartford Fund's fee schedule but pro-rated for the number of days elapsed in the month in question as a percentage of the total number of days in such month, based upon the average of that Hartford Fund's daily net asset value for the period in question, and paid within a reasonable time after the close of such period.

For the 529 Plans, HFMC does not charge a separate fee for investment advisory services to the 529 Plan. HLIC, an affiliate of HFMC, is the named Plan Manager for the 529 Plans and is entitled to a Plan Manager fee which it may use to compensate HFMC for services it performs with respect to the 529 Plans.

HFMC only receives fees for services provided to the Hartford Funds, therefore HFMC does not maintain standard fee schedules for other types of investment advisory clients.

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Other Fees

HFMC receives fees in connection with services provided to certain 529 Plans. These fees are in addition to the advisory fees HFMC may receive as an adviser to the underlying Hartford Mutual Funds that the 529 Plans invest in. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on transactions. Such charges, fees and commissions are exclusive of and in addition to HFMC's fee.

Item 6 – Performance-Based Fees and Side-By-Side Management

As noted in Item 5 above, HFMC charges The Hartford Global Alpha Fund an amount ranging from 0.60%-1.60% of the Fund's average daily net assets, based on the Fund's performance relative to a securities market index. HFMC does not currently accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client. Managing assets for a client with a performance based fee may create a conflict of interest for HFMC. For example, performance based fees may create an incentive to favor the performance fee account over non-performance fee accounts. To address any potential conflicts of interests, HFMC has implemented controls to ensure that all of its clients are treated fairly and equitably, and to identify, assess and monitor any actual and potential conflicts of interest.

Item 7 – Types of Clients

HFMC's investment advisory business consists primarily of acting as the investment manager to the Hartford Funds and certain Cayman Island private funds. HFMC also provides investment advisory and administrative services to the 529 Portfolios offered by certain 529 Plans for which HFMC's affiliate, HLIC, is the Plan Manager. With the exception of the Hartford Growth Allocation Fund and the Hartford Checks and Balances Fund ("Non-Sub-Advised Funds"), HFMC retains and is responsible for overseeing its sub-advisers. (For a discussion of HFMC's advisory business see Item 4.). HFMC does not retain a sub-adviser for the Non-Sub-Advised Funds.

HFMC does not require that its clients (the Hartford Funds and the 529 Plans) satisfy a minimum amount for opening or maintaining an account, however each of the Hartford Funds and each of the 529 Plans may independently impose such minimums on their investors. In addition, contract holders or qualified employee benefit plan investors that indirectly invest in certain Hartford Funds may be subject to account or investment minimums based upon the contract or plan.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

With respect to the Hartford Funds, HFMC hires and is responsible for managing the sub-advisers that provide portfolio management services (including asset allocation decisions) for each Hartford Fund that uses a sub-adviser. In addition, HFMC provides investment advisory and administrative services for 529 Portfolios of certain 529 Plans for which its affiliate, HLIC, is the Plan Manager.

HFMC employs a comprehensive manager evaluation and selection process to identify which investment strategies may be best suited for inclusion in the Hartford Funds Family using both quantitative and qualitative methods. People, Process and Performance (see below) are evaluated by HFMC's Investment Advisory Group and ultimately by the Investment Committee of the Hartford Funds' Board of Directors when a fund is proposed and launched. HFMC prefers investment strategies that are managed by portfolio managers or investment teams that utilize an articulated investment process and understandable investment philosophy with appropriate risk-adjusted results. The Investment Advisory Group attempts to give each of People, Process and Performance equal weight in its decision making process to select, retain or replace an investment professional(s) for any strategy. In the table below there is a summary list of some of the factors that are evaluated within the investment monitoring process. As previously explained the investment monitoring process is both quantitative and qualitative.

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<u>People - Qualitative</u>	<u>Process - Qualitative</u>	<u>Performance - Quantitative</u>
<ul style="list-style-type: none"> • Size and depth of organization • Ownership Structure • Compensation • Regulatory/Reputation • Compliance monitoring • Product asset growth • Investment Team and Resources • Tenure/experience • Turnover • Portfolio Knowledge • Work environment • Believability/enthusiasm 	<ul style="list-style-type: none"> • Investment philosophy • Investment approach • Buy/sell decisions • Evolution of process • Depth of Fundamental Research • Selection v. sector bets • Style consistency (performance, style and process) • Diversification/Concentration • Risk Metrics & Controls • Holdings Analysis 	<ul style="list-style-type: none"> • Trailing & Periodic Returns • Peer and Benchmark Relative Results • Yield Analysis • Return patterns (yearly, quarterly) • Risk (Beta) • Absolute Volatility (Std Deviation) • Excess return (Alpha) • Risk-adjusted returns (Sharpe) • Information Ratio • Batting Average • Upside/downside capture • Morningstar Rating • Returns Based Analysis • Performance Consistency

With respect to 529 Plans, HFMC utilizes similar metrics to recommend Hartford Funds that may become underlying investments for the 529 Portfolios in the 529 Plans.

Investing in securities involves risk of loss. Additional information regarding risks and investment strategies for each of the Hartford Funds is available in each Hartford Fund's prospectus and Statement of Additional Information ("SAI") or for the 529 Portfolios in the Program Brochure.

Item 9 – Disciplinary Information

The following legal events or proceedings or disciplinary events relate to HFMC or other affiliates of HFMC with respect to their business as either a registered investment adviser or insurance related businesses.

I. Closed Matters or Settlements in which one of HFMC's affiliates was a Party

a) (Nov. 8, 2006) The SEC alleged that Hartford Investment Financial Services, LLC (“HIFSCO”) and HL Investment Advisors, LLC (“HL Advisors”) violated sections 17(a)(2) and (3) of the Securities Act of 1933, Section 206(2) of the Investment Advisers Act of 1940, and Section 34(b) of the Investment Company Act of 1940 through misrepresentations or omissions of fact concerning the use of directed brokerage in connection with the marketing and distribution of the Hartford Funds and Hartford Annuities. The SEC alleged that Hartford Securities Distribution Company (“HSD”) caused and aided and abetted the alleged violations by HIFSCO and HL Advisors of Sections 17(a)(2) and (3) of the Securities Act of 1933 and Section 206(2) of the Investment Advisers Act of 1940. HIFSCO, HL Advisors and HSD voluntarily undertook or otherwise agreed to: 1) form a disclosure review committee designed to ensure that all prospectus and SAI disclosures for investment products are accurate; strengthen oversight over compliance matters related to preventing and deleting conflicts of interests, breaches of fiduciary duty, and violation of federal securities laws related to investment products; 2) ensure the respondents’ Board of Directors review and approve disclosures concerning certain payments made to broker-dealers and other intermediaries; and 3) strengthen overall compliance oversight provided within HIFSCO, HL Advisors and HSD. HIFSCO, HL Advisors and HSD were required to pay disgorgement of \$40 million and civil monetary penalties of \$15 million to the affected Hartford Funds. On November 8, 2006, the SEC issued an order that instituted administrative and cease-and-desist proceedings, made certain findings relative to these proceedings and imposed remedial sanctions and a cease-and-desist order pursuant to Section 8A of the Securities Act of 1933, Section 15(b) of the Securities Exchange Act of 1934, Sections 203(e) and 203(k) of the Investment Advisers Act of 1940, and Sections 9(b) and 9(f) of the Investment Company Act of 1940.

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Also on November 8, 2006, the respondents settled this matter without admitting or denying the findings set forth in the SEC's November 8, 2006 order.

b) In July of 2007, The Hartford entered into a settlement with the Attorneys General of the states of New York, Connecticut and Illinois relating to market timing and the company's individual variable annuity contracts. In accordance with the terms of that settlement, The Hartford established a settlement fund and hired an Independent Distribution Consultant to develop a plan to distribute the money in the settlement fund to eligible recipients, which included certain individual variable annuity contract holders. The Hartford also hired Rust Consulting Inc. to administer the plan of distribution. Rust began contacting and mailing checks to contract holders who were eligible to receive money from the settlement fund in April 2008. As of March 7, 2009, all of the checks for the distribution had been issued to eligible contract holders in accordance with The Hartford's settlement.

c) In 2004, five consolidated putative national class actions were brought against various Hartford entities, Hartford's retail mutual funds, and certain directors and officers of the retail mutual funds, alleging that excessive or inadequately disclosed fees were charged to retail mutual fund investors, that certain fees were used for improper purposes, and that undisclosed improper, or excessive payments were made to brokers. As the result of amendments to the complaint filed in response to motions to dismiss and the voluntary dismissal of certain claims and parties, as of December 31, 2007, the case included a single claim, which was settled in February 2008.

II. Pending Matters to which HIFSCO is a Party

In February 2011, a derivative action was brought on behalf of six Hartford retail mutual funds in the United States District Court for the District of New Jersey, alleging that Hartford Investment Financial Services, LLC ("HIFSCO"), an indirect subsidiary of The Hartford, received excessive advisory and distribution fees in violation of its statutory fiduciary duty under Section 36(b) of the Investment Company Act of 1940. HIFSCO moved to dismiss and, in September 2011, the motion was granted in part and denied in part, with leave to amend the complaint. In November 2011, plaintiffs filed an amended complaint on behalf of The Hartford Global Health Fund, The Hartford Conservative Allocation Fund, The Hartford Growth Opportunities Fund, The Hartford Inflation Plus Fund, The Hartford Advisors Fund, and The Hartford Capital Appreciation Fund. Plaintiffs seek to rescind the

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investment management agreements and distribution plans between HIFSCO and these funds and to recover the total fees charged thereunder or, in the alternative, to recover any improper compensation HIFSCO received, in addition to lost earnings. HIFSCO filed a partial motion to dismiss the amended complaint and, in December 2012, the court dismissed without prejudice the claims regarding distribution fees and denied the motion with respect to the advisory fees claims. In March 2014, the plaintiffs filed a new complaint that, among other things, added as new plaintiffs The Hartford Floating Rate Fund and The Hartford Small Company Fund and named as a defendant HFMC, an indirect subsidiary of The Hartford which assumed the role as advisor to the funds as of January 2013. In March 2015, the plaintiffs filed a new complaint that removed The Hartford Small Company Fund as a plaintiff. Discovery is ongoing. HFMC and HIFSCO dispute the allegations and expect to file a motion for summary judgment in the second quarter of 2015.

Item 10 – Other Financial Industry Activities and Affiliations

Commodity Pool Operator

HFMC is registered with the CFTC as a commodity pool operator.

Investment Advisers

HFMC is an affiliate of Hartford Investment Management Company (“HIMCO”), both indirect subsidiaries of The Hartford. HIMCO serves as adviser to the Hartford Variable Insurance Trust and other investment companies, as well as to separately managed accounts and provides investment management and advisory services for insurance companies under the ownership of The Hartford. HIMCO has a separate management team and operates as a separate and distinct line of business from that of HFMC. Disclosures for HIMCO may be found in its Form ADV Part 2A.

Affiliated Broker-Dealers

HFMC is affiliated with three registered broker-dealers, Hartford Funds Distributors, LLC (“HFD”), HIMCO Distribution Services Company (“HDSC”) and Hartford Securities Distribution Company (“HSD”). HFD serves as principal underwriter and distributor for the Hartford Funds and 529 Plans. HFMC does not execute client transactions through its affiliated broker-dealers and has no material business relationships with HDSC or HSD.

Conflicts of Interest

HFMC monitors for conflicts of interest in its investment advisory business with respect to the investment advisory services provided to the Hartford Funds, including the Hartford Conservative Allocation Fund, the Hartford Moderate Allocation Fund, the Hartford Growth Allocation Fund and the Hartford Checks and Balance Fund (collectively “Fund of Funds”), certain private funds and to 529 Plans. HFMC evaluates situations that may give rise to conflicts and has adopted policies and procedures relating to personal securities transactions and insider trading that are designed to prevent

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or detect actual conflicts of interest. (For a discussion on how HFMC monitors for conflicts of interest, see Item 11.)

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

HFMC has adopted a written Code of Ethics and Insider Trading Policy (the “Code”) based upon the principle that the officers, directors, and employees of HFMC and other designated persons (“Access Persons” or “Supervised Persons”) have a fiduciary duty to treat all clients fairly. HFMC has adopted and implemented policies and procedures that it believes are reasonably designed to address the conflicts associated with personal trading activities of Access Persons and/or Supervised Persons, prevent insider trading, and prevent the disclosure and misuse of its clients’ material nonpublic information.

Each Access Person and Supervised Person of HFMC receives a copy of HFMC’s Code upon determination of his/her status as an Access Person or Supervised Person and is required to complete training regarding the Code. Access Persons also are required to file a report of any reportable securities and or brokerage accounts held either directly or indirectly as well as report personal securities transactions at least quarterly. On an annual basis each Access Person must certify compliance with the Code. Additionally, pursuant to the Code, Access Persons must obtain prior written approval before purchasing initial public offerings and limited offerings.

HFMC’s Code also establishes policies and procedures to monitor Supervised Persons. Supervised Persons are individuals who do not, as part of their regular functions and duties with HFMC, make, participate in, or have information regarding the purchase or sale of securities by HFMC’s clients, have access to nonpublic information about the portfolio holdings of the Hartford Funds or the 529 Portfolios, or make recommendations about securities or investments to HFMC’s clients.

Each Supervised Person of HFMC receives a copy of HFMC’s Code upon determination of his/her status as a Supervised Person and is required on an annual basis, to: 1) complete training on the Code 2) certify compliance with the Code; and 3) certify that there have been no changes in his/her regular functions and duties in regard to HFMC’s clients. In addition, each sub-adviser to a Hartford Fund has also adopted its own Code of Ethics. HFMC reviews the adequacy of each sub-adviser’s Code of

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Ethics and requires the sub-adviser to certify compliance with its Code of Ethics on a quarterly and annual basis.

A copy of HFMC's Code can be obtained by contacting Rita Rauscher at 610-386-7374 or by email at: rita.rauscher@hartfordfunds.com.

Item 12 – Brokerage Practices

Broker Selection and Execution

With respect to the Hartford Funds (other than The Hartford Growth Allocation Fund and The Hartford Checks and Balances Fund), each Hartford Fund's sub-adviser is responsible for making determinations concerning the selection of brokers for the Hartford Fund's transactions and for assessing the reasonableness of the compensation charged, subject to the Hartford Funds' Commission Recapture Program. With respect to the Fund of Funds and 529 Plans, which invest in shares of other Hartford Funds, no brokerage compensation is paid in connection with such transactions. While the sub-advisers to a Hartford Fund, private fund or 529 Portfolio may receive soft dollar benefits in support of the Hartford Funds' or 529 Portfolio's transactions, HFMC does not directly receive any soft dollar benefits in connection with securities trades of its investment advisory clients.

HFMC has adopted procedures to monitor sub-adviser trading and execution. HFMC performs on-site due diligence reviews during which a sub-adviser is requested to provide various commission and trade reports. HFMC reviews the reports for trade exceptions, directed brokerage issues and potential conflicts. Due diligence reviews generally review compliance practices with various Fund policies including but not limited to valuation, liquidity, affiliated transactions and portfolio guideline compliance.

Commission Recapture

HFMC has established a commission recapture program. Commission recapture is a form of discount brokerage that rebates a portion of trading commissions directly back to an investment company, pension plan or other institutional investor. HFMC sponsors a program for the benefit of its fund shareholders that permits a sub-adviser the discretion on whether or not to participate in its commission recapture programs subject to allocation considerations. A sub-adviser is requested to direct trades through HFMC's commission recapture program when, in consideration of best execution, executing a trade is in the best interests of shareholders.

Prohibition on the Use of Brokerage Commissions to Finance Distributions

Hartford Funds and HFMC have implemented policies and procedures prohibiting the use of brokerage commissions to finance fund distribution in compliance with Rule 12b-1(h) of the Investment Company Act of 1940 (“Rule 12b-1”). HFMC monitors a sub-adviser to ensure compensation was not made to a broker for promotion or sale of Hartford Funds by directing brokerage or any other remuneration to that broker. In addition, HFMC monitors the sharing of information regarding Fund distributions to sub-adviser trading or portfolio management personnel.

Item 13 – Review of Accounts

The Investment Advisory Group (“IAG”) is overseen by HFMC’s Chief Investment Officer. IAG reviews and evaluates the performance of the Hartford Funds, certain private funds and the 529 Portfolios, as well as the performance of the sub-adviser to each Hartford Fund or 529 Portfolio, on approximately a quarterly basis, based upon such factors as portfolio characteristics, market analysis, portfolio position and outlook. With respect to the Hartford Funds, IAG also conducts annual due diligence meetings with each portfolio manager and provides a quarterly written report and analysis about each Hartford Fund to the Investment Committee of the Hartford Funds’ Board of Directors.

For the 529 Plan, IAG provides quarterly written reports to the 529 Plan on the performance of each 529 Portfolio.

In addition, the Investment Product Oversight Committee (“IPOC”) led by HFMC’s Chief Investment Officer regularly reviews the performance of the Hartford Funds and the performance of the portfolio managers managing the Hartford Funds’ assets. IPOC evaluates product ideas, new funds, mergers, and changes to Fund strategies.

Item 14 – Client Referrals and Other Compensation

HFMC does not receive any economic benefit directly or indirectly from persons who are not clients for providing investment advice or other advisory services to its investment advisory clients. HFMC does not actively solicit clients, does not have solicitors, and does not enter into cash referral arrangements for the purpose of client referrals.

Item 15 – Custody

HFMC does not take custody of its clients' assets or securities. With respect to the holdings of each Hartford Fund and private fund, each client has entered into an agreement with an independent qualified custodian, pursuant to which the client receives account statements directly and should carefully review those statements.

Item 16 – Investment Discretion

HFMC has been granted investment discretion by the Board in the investment advisory contracts between each Hartford Fund and HFMC. However, the day-to-day portfolio management for the Hartford Funds has been delegated through an agreement to a sub-adviser for those funds using a sub-adviser. The sub-adviser is given complete discretion to purchase and sell securities for the applicable Fund in accordance with the Fund's investment objective, policies, restrictions approved by the Board, the laws and regulations (including federal securities and tax laws) under which Hartford Funds operate, as well as disclosures in each Hartford Fund's prospectus and SAI.

With respect to the 529 Plan that is an investment advisory client of HFMC, HFMC has not been granted investment discretion in respect of the 529 Portfolios; the Hartford Funds or other mutual funds offered as underlying funds to the 529 Portfolios are subject to approval by the 529 Plan's Trust.

Item 17 – Voting Client Securities

Pursuant to the Hartford Funds' Proxy Voting Policy, the sub-adviser to the Hartford Funds' (other than the Funds of Funds that are not sub-advised) has been delegated the authority to vote all proxies relating to the Hartford Funds' portfolio holdings. A sub-adviser exercise of this delegated proxy voting authority is subject to oversight by HFMC. A sub-adviser has a duty to vote or not vote such proxies in the best interests of each Hartford Fund and to avoid conflicts of interest. With respect to The Hartford Growth Allocation Fund and The Hartford Checks and Balances Fund, pursuant to its Proxy Voting Policy, HFMC votes any proxies of the underlying Hartford Funds in which the invest in the same proportion as the vote of the underlying Hartford Funds' other shareholders, (sometimes called "mirror" or "echo" voting).

A copy of HFMC's Proxy Voting Policy can be obtained by contacting Rita Rauscher, at 610-386-7374 or by email at: rita.rauscher@hartfordfunds.com

Item 18 – Financial Information

HFMC does not require nor solicit pre-payment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this Brochure.

HFMC has no financial conditions that are likely to materially impair its ability to meet contractual commitments to the Hartford Funds and the 529 Plan for which it provides advisory services (its clients). HFMC has not been the subject of a bankruptcy proceeding in the past ten years.