

Item 1 – Cover Page**Hartford Funds Management Company, LLC****690 Lee Road
Wayne, PA 19087****Form ADV Part 2A**hartfordfunds.com

March 18, 2024

IARD/CRD Number: 147746

SEC Number: 801-77209

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 Nancy Davis Scholz at 610-386-7374 or by email at: nancy.scholz@hartfordfunds.com.

HFMC is registered as an investment adviser (“Adviser”) with the Securities and Exchange Commission (“SEC”). Registration does not imply a certain level of skill or training.

The information in this Brochure has not been approved or verified by 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 its last update. Since its last update in March 2023, HFMC amended its proxy voting policies related to its Funds of Funds, which can be found on page 17.

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	6
Item 6 – Performance-Based Fees and Side-By-Side Management	8
Item 7 – Types of Clients.....	8
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	9
Item 9 – Disciplinary Information	10
Item 10 – Other Financial Industry Activities and Affiliations.....	10
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12 – Brokerage Practices.....	13
Item 13 – Review of Accounts	16
Item 14 – Client Referrals and Other Compensation	16
Item 15 – Custody	17
Item 16 – Investment Discretion	17
Item 17 – Voting Client Securities	17
Item 18 – Financial Information	18

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 SEC- registered open-end investment companies, including mutual funds and exchange traded funds and a closed end, tender offer fund (collectively, “Hartford Funds” and each series of which is a “Hartford Fund”)¹ and three Cayman Islands private funds for which HFMC serves as general partner.²

HFMC is also the program manager (the “Program Manager”) to The Hartford Smart529 College Savings Plan, the SMART529 Select College Savings Plan and SMART529 WV Direct College Savings Plan (together, the “529 Plans”). As Program Manager, HFMC and/or its affiliates provides provide certain services to the 529 Plans. In addition, HFMC provides non-discretionary investment advisory services to the 529 Plans. 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. Certain 529 Portfolios also invest in Hartford exchange traded funds and one unaffiliated separate account pooled investment vehicle.

HFMC is the parent of Lattice Strategies LLC (“Lattice”), a registered SEC investment adviser. Lattice is the investment adviser to multi-factor exchange traded funds. Employees perform services on behalf of both HFMC and Lattice.

HFMC generally provides investment advisory services to its mutual funds and exchange traded funds through use of a manager of managers or sub-advisory structure. HFMC is responsible for the management of the Hartford Funds and supervises the activities of the investment sub-advisers as well as provides administrative services including, among other services, compliance, legal, governance and other activities required by Hartford Funds. HFMC makes day to day investment allocation decisions for the Hartford Growth Allocation Fund, Hartford Conservative Allocation Fund, Hartford Moderate

¹ The Hartford Mutual Funds, Inc., The Hartford Mutual Funds II, Inc., Hartford Series Fund, Inc., and HLS Series Fund II, Inc. are combined to form Hartford Mutual Funds. Hartford Funds Exchange-Traded Trust are combined to form “Hartford Exchange Traded Funds” or “Hartford ETFs”. Collectively, Hartford Mutual Funds, Hartford Schroders Private Opportunities Fund and Hartford ETFs are referred to as “Hartford Funds”.

² The Cayman Funds are wholly-owned subsidiaries of the Hartford Real Asset fundthe Hartford Schroders Diversified Growth Fund, and the Hartford Schroders Commodity Strategy ETF and are not offered to the public. The sole purpose of the Cayman Funds is to gain exposure to commodity-linked instruments.

Allocation Fund and Hartford Checks and Balances Fund (collectively, “Hartford Funds of Funds”) which invest in shares of other Hartford Funds.

Investment 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 Plan, in accordance with the requirements of a 529 Plan’s offering statement.

HFMC also offers non-discretionary security recommendations in the form of model portfolios through its participation in separately managed account programs or unified managed accounts (“Programs”) that are sponsored by non-affiliated investment advisers (“Program Sponsors”). HFMC does not sponsor a wrap fee program and does not actively manage accounts in wrap fee programs sponsored by others. The Program Sponsors provide brokerage execution, custody and account administrative services for a single fee. HFMC’s model portfolios provided to these Program Sponsors are referred to as “Model Portfolio Strategies”.

For these Model Portfolio Strategies, HFMC may rely solely upon security recommendations from non-affiliated registered investment advisers (“Non-Affiliated Model Providers”). Non-Affiliated Model Providers also serve as sub-advisers to registered investment companies sponsored by HFMC for which HFMC serves as investment manager.

In connection with HFMC’s Model Portfolio Strategy offerings, HFMC provides to a Program Sponsor a model securities portfolio for a particular investment strategy. Based on the model portfolio, the Program Sponsor exercises investment discretion and executes transactions on behalf of the Program Sponsor’s clients based on the Program Sponsor’s discretionary authority.

HFMC provides investment management services in connection with its Model Portfolio Strategies that differ from the investment advisory services it furnishes to the Funds and the 529 Plan. For example, the Funds employ investment strategies and techniques and invest in securities that may not be used in connection with the Model Portfolio Strategies.

In particular, the Model Portfolio Strategies generally:

- Limit eligible investments to publicly traded securities and do not invest in private placements, other illiquid securities, restricted securities or other securities that are not freely or frequently traded;
- Do not use derivatives or other complex investments for hedging or other portfolio management purposes;
- Do not participate in initial public offerings or secondary offerings;

- Have lower trade frequency as compared to the Funds, which typically have daily subscription and redemption activity; and
- Have fewer security holdings, than the Funds even though the Model Portfolio Strategy may utilize security recommendations from the same investment team using similar investment strategies and /or techniques.

In addition, and separate from the above Model Portfolio Strategies, HFMC constructs model portfolios (“Hartford Funds Model Portfolios”) based upon the discussions and feedback from its Asset Allocation Committee (“Committee”). Unlike the Model Portfolio Strategies that invest directly in equity securities, Hartford Funds Model Portfolios include only mutual funds and exchange traded funds. The Committee is comprised of members of HFMC’s Multi-Asset Solutions Team and members of HFMC’s Investment Advisory Group’s Manager Research Team, along with members from two non-affiliated investment advisers, Wellington Management Company LLP (“Wellington Management”) and Schroders Investment North America, Inc. (“Schroders”). The Hartford Funds Multi-Asset Solutions Team leverages the in-depth research of Wellington and Schroders, and the collaborative Committee process, to construct the Hartford Funds Model Portfolios that include Hartford mutual funds and exchange traded funds as well as unaffiliated mutual funds and exchange traded funds. The Hartford Funds Model Portfolios are not publicly available and are intended and available for Program Sponsors as described above.

As of December 31, 2023, HFMC managed \$127.1 billion on a discretionary basis and \$1.6 billion on a non-discretionary basis. HFMC had approximately \$297 million in assets under advisement.

Item 5 – Fees and Compensation

Advisory Fees

Hartford Funds: HFMC receives fees for its services to Hartford Funds including among others, investment management and administrative services. These fees are negotiated and approved by the Hartford Funds’ Board of Directors / Trustees (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 is subject to an expense waiver and or reimbursement arrangement for that Hartford Fund, as subject and agreed upon by HFMC. Each Hartford Fund pays HFMC for its services on a monthly basis; fees are deducted directly from each Hartford Funds’ custodian account. The current fee schedule for each Hartford Fund is disclosed in its SEC registration statement and at 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 Funds' fee schedule. The fees are 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.

529 Plans: HFMC receives the investment advisory fee for underlying Hartford Funds that are used in certain 529 Portfolios.

Model Portfolio Strategies: Advisory fees paid to HFMC for its Model Portfolio Strategies are agreed to between HFMC and the Program Sponsor.

Hartford Funds Model Portfolios: There are no advisory fees paid to HFMC for these models; however, HFMC receives the advisory fees for the underlying Hartford Funds that are used within these models.

Other Fees

In connection with services provided, HFMC may also receive fees from investment managers/distributors to unaffiliated funds offered in the 529 Plans. HFMC receives a Plan Manager fee for services it performs with respect to the 529 Plans as disclosed in the 529 Plans' current offering statement, which are generally based on stated percentage of the 529 Portfolio's average daily assets.

Shareholders of the Funds may incur other fees and expenses imposed by their financial intermediary. HFMC does not receive a portion of these fees or expenses. For certain retirement and Coverdell accounts, HFMC receives an annual account maintenance fee and a portion of the custodial fees associated with these accounts.

Clients of Program Sponsors may incur certain charges imposed by custodians, brokers, third party investment advisers 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 separate from- HFMC's advisory fee.

HFMC does not enter into solicitation arrangements on behalf of the Hartford Funds. HFMC has entered into a solicitation agreement with Schroders, pursuant to which Schroders has engaged

HFMC to refer, offer and provide marketing support services with respect to certain Schroders strategies that are offered through separately-managed account or unified managed account platforms. HFMC is entitled to receive 15 basis points on total new assets invested in the Schroders International EAFE ADR Strategy as measured at the end of each quarter. In addition, HFMC is entitled to receive an annual fee of 8 basis points on certain “aged assets” that remain invested for more than one year, which will be calculated as 2 basis points on the amount of aged assets and will be paid quarterly within 30 days of the end of each calendar quarter. For all other Schroders’ strategies, HFMC is entitled to receive 35% of the total management fee received by Schroders.

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

HFMC does not charge any performance fees. Consequently, HFMC does not engage in side-by-side management of accounts that are charged a performance-based fee with accounts that are charged another type of fee.

Item 7 – Types of Clients

HFMC does not provide individual investment advice to retail or institutional accounts.

HFMC’s investment advisory business consists primarily of serving as the investment manager to Hartford Funds. HFMC also provides various services to the 529 Portfolios as Program Manager to the 529 Plans. With the exception of the Hartford Funds of Funds, HFMC retains and is responsible for overseeing the sub-advisers to the Hartford mutual funds and exchange traded funds (for a discussion of HFMC’s advisory business *see Item 4.*).

Each of the Hartford Funds and each of the 529 Plans independently impose a minimum account amount on shareholder investment into the Funds. In addition, contract holders or qualified employee benefit plan investors that indirectly invest in certain Hartford Funds are subject to account or investment minimums based upon the contract or plan.

HFMC provides non-discretionary security recommendations through Model Portfolio Strategies and the Hartford Funds Model Portfolios to Program Sponsors. HFMC does not provide individual investment advice to the clients of Program Sponsors. For these offerings, account minimums are established by the Program Sponsor, as agreed upon by HFMC.

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 day to day portfolio management services (which also include asset allocation decisions) for each Hartford Fund that uses a sub-adviser. HFMC also provides investment advisory and administrative services to certain 529 Plans.

HFMC employs a comprehensive manager evaluation and selection process to identify which investment strategies it believes are best suited for inclusion in its product offerings 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/Trustees when a new fund is proposed and launched. HFMC seeks 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 seeks 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. Listed in the table below is a summary of some of the quantitative and qualitative factors that are evaluated within the investment selection and monitoring process.

<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 • Environmental, Social, Governance (ESG) integration 	<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 • Alternative fund objectives

With respect to 529 Plans, HFMC utilizes similar metrics to recommend Hartford Funds and non-Hartford Funds as underlying investments for the 529 Portfolios in the 529 Plans for which HFMC serves as investment manager, subject to review and approval by the State's Board of Trustees to the 529 Plans and independent consultant to the 529 Plans.

For its Model Portfolio Strategies, HFMC utilizes the services of Non-Affiliated Model Providers to develop investment strategies and provide security recommendations for the strategies. The Non-Affiliated Model Provider is compensated for its services based on a percentage of assets under advisement and held by the Program Sponsors. HFMC is responsible for overseeing the Non-Affiliated Model Providers, which also serve as sub-advisers to certain Hartford Funds.

For the Hartford Funds Model Portfolios, HFMC's Asset Allocation Committee is responsible for developing asset allocation models and providing underlying investment recommendations for each of these models. The Committee is comprised of members of HFMC, Wellington and Schroders. Neither Wellington nor Schroders is directly compensated for their role in the Committee. The Hartford Funds Model Portfolios utilize both proprietary and non-proprietary mutual funds and ETFs, including mutual fund and ETFs for which Wellington and Schroders serve as sub-advisers.

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 Offering Statement.

Item 9 – Disciplinary Information

There are no legal events or proceedings or disciplinary events related to affiliates of HFMC, with respect to their business as either a registered investment adviser or insurance related businesses within the last 10 years.

Item 10 – Other Financial Industry Activities and Affiliations

Investment Advisers

HFMC is an affiliate of Hartford Investment Management Company ("HIMCO"), both indirect subsidiaries of The Hartford. HIMCO provides investment advisory services primarily to institutional clients (including affiliated and unaffiliated insurance companies, corporations and employee benefit and pension plans), as well as private funds. HIMCO has a separate management team and operates as a separate and distinct line of business from that of HFMC.

HFMC is the parent of Lattice Strategies LLC. Lattice serves as investment adviser to the multi-factor exchange traded funds. HFMC's President, Chief Compliance Officer, Chief Financial Officer and General Counsel all serve in a similar capacity to Lattice Strategies LLC. Employees may

perform services on behalf of both HFMC and Lattice.

Disclosures for both HIMCO and Lattice can be found in its respective Form ADV Part 2A.

Affiliated Broker-Dealers

HFMC is affiliated with one registered broker-dealer, Hartford Funds Distributors, LLC (“HFD”). HFD serves as principal underwriter and distributor for HFMC’s mutual and closed-end funds and 529 Plans. HFD is registered with FINRA and the MSRB. HFMC does not execute client transactions through its affiliated broker-dealer. HFMC’s ETFs are distributed and under-written through ALPS Fund Services, Inc., a non-affiliated broker-dealer. Certain Management Persons and employees are Registered Representatives of HFD.

HFD has also entered into solicitation arrangements with Wellington and Schroders, pursuant to which HFD offers and provides marketing support services with respect to certain investment strategies offered through collective investment trusts.

Commodity Pool Operator

HFMC is registered with the CFTC as a commodity pool operator. Certain Management Persons are Associated Persons with the NFA.

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 Funds of Funds, private funds, 529 Plans and to the Hartford Funds Model Portfolios. HFMC evaluates situations that give rise to potential conflicts and has adopted policies and procedures relating to personal securities transactions and insider trading that are designed to prevent 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 (all of which are designated persons “Access Persons”, “Investment 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, prevent insider trading, and prevent the disclosure and misuse of its clients' material nonpublic information.

Each employee of HFMC receives a copy of the Code upon employment and is required to complete initial training regarding the Code. Employees 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. Exceptions apply to accounts over which an employee does not have investment-discretion. On an annual basis each Access Person must certify compliance with the Code and complete annual training. Pursuant to the Code, Access Persons must obtain prior written approval before purchasing initial public offerings and limited offerings or engaging in outside business activities. Individuals who have been designated as Investment Persons are subject to additional pre-clearance and holding requirements.

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 non-public 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 and training on HFMC's Code upon determination of his/her status as a Supervised Person and is required on an annual basis, to: 1) acknowledge receipt and certify compliance with the Code; and 2) 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 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 Nancy Davis Scholz at 610-386-7374 or by email at nancy.scholz@hartfordfunds.com.

Item 12 – Brokerage Practices

Broker Selection and Execution

Hartford Funds: With the exception of the Hartford Funds of Funds, 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, as applicable.

HFMC generally relies on the Funds' sub-advisers for broker selection and making other determinations concerning trade execution, including decisions regarding trade aggregation and rotation. Accordingly, a Fund's sub-adviser is responsible for determining whether to aggregate portfolio securities transactions executed on behalf of the Funds with other discretionary accounts managed by the sub-adviser and for determining the order in which the sub-adviser places trade orders for such portfolio securities transactions. Generally, sub-advisers determine in their sole discretion the order in which to place portfolio securities transactions for one or more groups of accounts based on the sub-adviser's policies and a number of factors, including liquidity and other market conditions, the type of security and transaction, the executing broker-dealer's commitment of capital, or anticipated market impact and confidentiality considerations. HFMC has adopted procedures to monitor sub-adviser trading and execution.

The Hartford Funds of Funds also invest in affiliated exchange traded funds. Trading in these securities is conducted by an internal trading desk. HFMC has adopted trading policies and procedures related to aggregation and allocation to ensure fair and equitable treatment across all accounts. The Best Execution Committee is responsible for the review and approval of brokers, trade aggregation, allocation and best execution.

529 Plans: With respect to 529 Plans, which invest in shares of other Hartford mutual funds and exchange traded funds, non-Hartford mutual funds and a separate account, brokerage compensation is paid in connection with transactions in the ETFs that are traded through the internal trading desk, subject to the review and oversight by the Best Execution Committee.

Model Portfolio Strategies and Hartford Funds Model Portfolios: HFMC is not responsible for selecting brokers or executing any portfolio securities transactions for any accounts maintained by a Program Sponsor. HFMC has neither investment nor brokerage discretion for any accounts of the Program Sponsors to which HFMC provides non-discretionary security recommendations in connection with these offerings.

For its Model Portfolio Strategies, HFMC relies on Non-Affiliated Model Providers, which also act as sub-advisers to HFMC sponsored Funds, to make security recommendations. Although a non-affiliated Model Provider may use substantially similar investment processes to develop securities recommendations for a Model Portfolio Strategy and Hartford Fund, the Model Provider's decision to recommend a portfolio securities transaction and related communication of such recommendations to HFMC in connection with a Model Portfolio Strategy is handled separately from the Model Provider's trading policies in its role as sub-adviser to certain Funds.

Model Portfolio Strategies: Wellington Management Company LLP, the Model Provider, also acting in its capacity as sub-adviser to a similar Hartford Fund, will make investment recommendations for the Model Portfolio Strategy concurrently with the trading decisions for the similar Fund. At the time of the decision, the Model Provider may recommend similar trades for the Model Portfolio Strategy and the Fund, may recommend different trades for the Model Portfolio Strategy and the Fund, and / or may make a recommendation for a Fund and no recommendation for the Model Portfolio Strategy. When similar trades are recommended for both the Model Portfolio Strategy and the Fund, dissemination of such trade recommendations will be communicated contemporaneously for the Model Portfolio Strategy and the Fund. Upon receipt of trade recommendations for the Model Portfolio Strategy, HFMC will promptly communicate trade instructions in accordance with its trade rotation procedures to the Program Sponsors.

Hartford Funds Model Portfolios: Although the underlying funds used in the Hartford Funds Model Portfolio may also be utilized in the Funds of Funds and 529 plan accounts, with the exception of the proprietary accounts of de minimis account value that were created solely to track the performance of the Hartford Funds Model Portfolios, HFMC does not manage any other account that uses a similar investment strategy to the Hartford Funds Model Portfolios.

Model Portfolio Trade Rotation

HFMC will rotate the delivery of changes to Model Portfolio Strategies and its Hartford Funds Model Portfolios among the Program Sponsors in a fair and equitable manner. HFMC or its agent will release changes based on a random rotation process that is designed to ensure that no Program Sponsor is systematically disadvantaged. HFMC generally anticipates that the agent, upon receipt of the model from HFMC, will communicate to Program Sponsors changes in a prompt manner. The Program Sponsor is responsible for implementing within Program Sponsor's accounts the changes, whereby the Program Sponsor may make adjustments to securities holdings, weightings, and other changes. For the proprietary accounts for which HFMC utilize the Model Portfolio Strategies or Hartford Funds Model Portfolios, HFMC will execute orders for such account after its agent has communicated changes to Program Sponsors.

Accordingly, it is likely that a Program Sponsor's clients may experience differences in performance as compared to the performance of the Model Portfolio Strategy or Hartford Funds Model Portfolio, other Program Sponsors or the performance of any proprietary account managed by HFMC based on the Model Portfolio Strategy or Hartford Funds Model Portfolio.

Soft Dollars

HFMC does not participate in any soft dollar program. While the sub-advisers receive certain soft dollar benefits in support of the Hartford Funds' transactions, HFMC does not directly receive any research services in connection with the execution of such trades.

Commission Recapture

HFMC has established a commission recapture program for certain of its sub-advised Funds. 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 the 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 such type of 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 its sub-advisers 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 distribution payments to sub-adviser trading or portfolio management personnel.

Item 13 – Review of Accounts

Hartford Funds' Investment Advisory Group ("IAG") is overseen by HFMC's Chief Investment Officer. IAG reviews and evaluates the performance of the Hartford Funds and the Model Portfolio Strategies. IAG also reviews and evaluates performance of the sub-adviser to each Hartford Fund, on an on-going basis, based upon such factors as portfolio characteristics, market analysis, portfolio position and outlook. With respect to the Hartford Funds, IAG also conducts due diligence meetings at least semi-annually 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/ Trustees.

With respect to the 529 Portfolios, Hartford Funds' Multi-Asset Solutions ("MAS") team periodically reviews and evaluates the performance of the portfolios for which it serves as investment manager

With respect to the Hartford Fund Model Portfolios, the Asset Allocation Committee reviews the asset-class attribution during Committee meetings; performance is reviewed monthly.

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. In addition to fund performance, 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 use solicitors, and does not enter into cash referral arrangements.

Item 15 – Custody

HFMC does not take custody of its clients' assets or securities.

Item 16 – Investment Discretion

HFMC currently employs Wellington Management, Schroders Investment Management North America Inc. and Schroders Investment North America Ltd (collectively, Schroders) as sub-advisers for each Hartford Fund other than the Hartford Funds of Funds. As sub-advisers, Wellington and Schroders are responsible for day-to-day portfolio management. HFMC monitors and supervises the activities of Wellington and Schroders and would do the same for any other sub-advisers and can terminate the services of any sub-adviser at any time, subject to the notice periods set forth in the applicable sub-advisory agreement.

With respect to the Hartford Funds of Funds, HFMC's portfolio managers have investment discretion and are responsible for the investment and allocation decisions.

With respect to the 529 Plans, HFMC does not have discretion. Investment products selected for and offered as underlying funds to the 529 Portfolios with the 529 Plan, including any Hartford Funds, are subject to the approval by a 529 Plan's Board of Trustees.

For its Model Portfolio Strategies and Hartford Funds Model Portfolios, HFMC does not have investment discretion.

Item 17 – Voting Client Securities

Pursuant to the Hartford Funds' Proxy Voting Policy, the sub-advisers Hartford Funds' have been delegated the authority to vote all proxies relating to the Hartford Funds' portfolio holdings. A sub-adviser's 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. The Funds of Funds allocate their assets in a combination of other Hartford Funds ("Underlying Funds"). With respect to the Funds of Funds, HFMC will vote any proxies received by the Funds of Funds for its Underlying Funds in accordance with the Board's recommendation, unless the Board directs HFMC to vote the proxies in some other manner, including, but not limited to, voting in proportion of the unaffiliated shareholders of the Underlying Funds ('echo voting').

HFMC can also vote proxies on behalf of the sub-advisers if the sub-advisers believe there is a conflict of interest in voting the proxies.

With respect to proxies for the underlying funds that the 529 Plans invest in, HFMC will not vote the proxy, but will instead require that the State vote any such proxy.

For its Model Portfolios, Program Sponsors for which HFMC is responsible for voting proxies, HFMC has delegated proxy voting to the Non-Affiliated Model Provider.

HFMC has been delegated proxy voting authority for retirement and 403(b) accounts for which HFMC is the sponsor as provided for in certain custodial/disclosure documents. As a result, if retirement and/or 403(b) owners do not vote, the custodial/disclosure documents provide that the shareholder directs HFMC to vote the shareholders' fund shares in the same proportion as other fund shareholders.

HFMC may hold securities in proprietary accounts and may elect in its sole discretion to vote or abstain from voting such securities. Currently HFMC's only proprietary accounts are seed accounts, established solely for purposes of establishing a performance track record. HFMC does not currently vote proxies for securities held in such accounts.

The proxy voting policies and procedures, together with information concerning HFMC's proxy votes are available to clients, without charge, upon request. A copy of HFMC's Proxy Voting Policy can be obtained by contacting Nancy Davis Scholz, at 610-386-7374 or by email at: nancy.scholz@hartfordfunds.com.

Item 18 – Financial Information

HFMC has no financial conditions that are likely to materially impair its ability to meet contractual commitments to its clients. HFMC has not been the subject of a bankruptcy proceeding in the past ten years.