

Statement of Policy on Conflict of Interest
Relating to Grant Requests
of
The John A. Hartford Foundation, Inc.

The Foundation's "Statement of Policy on Conflict of Interest" as adopted by the Board of Trustees on March 13, 2014 ("Policy on Conflict of Interest") provides:

'A conflict of interest or the appearance thereof may exist when any officer, Trustee or key employee (as defined in the Policy on Conflict of Interest) of The John A. Hartford Foundation, Inc. (the "Foundation") has any direct or indirect financial interest in, or any family, fiduciary or other material relationship with, any individual or organization that proposes to enter into any contract or other transaction with the Foundation, or to which the Foundation proposed to make a grant or other payment.

Conflicts of interest or appearances thereof are not limited to financial interest, but include affiliations or other divided loyalties which may influence a decision or appear to cause favoritism in a matter involving the Foundation.'

In furtherance of this policy and its requirement to avoid even the appearance of a conflict of interest, all grants proposed by a Trustee, as well all grants recommended for approval by another individual in which any Trustee may have a conflict of interest, must be fully disclosed to the Audit Committee and the Board of Trustees in accordance with the Policy on Conflict of Interest. However, matching gifts do not become subject to the Conflict of Interest Policy solely because they are made on a Trustee's recommendation.

In addition, the procedure for reviewing such a proposed grant shall be the procedure outlined in the Policy on Conflict of Interest. However, the Board may authorize the Grants Committee of the Board to act in its stead.