

Statement of Policy on Conflict of Interest of The John A. Hartford Foundation

As adopted by the Board of Trustees on March 13, 2014, replacing any and all statements of policy on Conflicts of Interest previously adopted.

A conflict of interest or the appearance thereof may exist when any officer, Trustee or key employee¹ of The John A. Hartford Foundation (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 proposes to make a grant or other payment.

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

All conflicts shall be fully disclosed to the Audit Committee and the Board of Trustees (the “Board”), in the case of officers and Trustees, or to the appropriate officer, in the case of key employees. After receipt of such notice, the Board may authorize the contract, transaction, grant or payment at issue, provided, however, that (i) it does not violate the law, including applicable self-dealing prohibitions, (ii) the Board determines it to be fair, reasonable and in the Foundation’s best interest, and (iii) the officer or Trustee having such conflict refrains from voting or otherwise attempting to influence the decision thereon. The minutes of the meeting shall reflect such disclosure and abstention, as well as the basis for the Board’s approval of the contract, transaction, grant or payment at issue. The officer or Trustee having such conflict may not be present at or participate in any Board or committee deliberations or vote with regard to the contract, transaction, grant or payment at issue, provided that the Board or committee may request that the officer or Trustee present information concerning matter at issue prior to the commencement of deliberations or voting thereon. In the case of an employee, after disclosure to the appropriate officer, that officer may choose to submit the question to the Board for a decision or to proceed with the contract, transaction, grant or payment at issue, provided, however, that the Audit Committee shall have been fully informed of the conflict by the officer, and proceeding does not violate the law.

¹ The definition of “key employee” in the New York Non-Profit Revitalization Act of 2013 is “any person who is in a position to exercise substantial influence over the affairs of the corporation,” as referenced in Internal Revenue Code Section 4958(f)(1)(A) and Reg. §53.4958-3(c), (d) and (e), which is to say a “disqualified person.”

Prior to his or her initial election to the Board, and at least annually thereafter, each Trustee must complete, sign and submit to the Secretary of the Foundation the statement and certification attached to this Policy. The Secretary of the Foundation shall provide a copy of all such completed statements and certifications to the Audit Committee.

The John A. Hartford Foundation

I have read the Conflict of Interest Policy. In compliance with the Conflict of Interest Policy I am hereby disclosing the following to the best of my knowledge:

Paid or unpaid employment with, any board memberships on, or any ownership interest (as sole proprietor, partner or greater than 5% shareholder) in, or any personal benefit from, any nonprofit or for-profit organizations, including other private foundations, that might have a relationship or transactions with the John A. Hartford Foundation. In the event that a new relationship occurs, I will immediately disclose it.

Trustee/Key Employee

Date

Chair, Audit Committee

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

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 (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.