

Hartford Funds Management Company, LLC  
*Client Relationship Summary (Form CRS) for Retail Investors*

March 2024

**ITEM 1 - INTRODUCTION:** Hartford Funds Management Company, LLC (“HFMC” “we” or “us”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for retail investors like you to understand these differences. Free and simple tools are available to research firms and financial professionals at [investor.gov/crs](https://investor.gov/crs) which also provides educational materials about broker-dealers, investment advisers, and investing.

### **ITEM 2 – RELATIONSHIPS AND SERVICES**

#### ***What investment services and advice can you provide me?***

We provide non-discretionary investment advisory services by delivering equity and asset allocation model portfolios (“Model Portfolios”) to non-affiliated investment advisers (“Program Sponsors”) of separately managed account programs or unified managed accounts (“Programs”). These Programs are made available to retail clients solely through the Program Sponsor and we do not otherwise provide advice to you. Model Portfolios are not based on, or tailored to, the needs of any particular investor but are designed to meet particular investment strategies desired by the Sponsor. Certain Model Portfolios also benefit from non-affiliated model providers who provide security recommendations. HFMC does not sponsor any Program and does not actively manage accounts for Program Sponsors.

The Model Portfolios are non-discretionary in that if you or the Sponsor selects one of our Model Portfolios, then the Sponsor makes the ultimate decision regarding the purchase or sale of investments for your account, not HFMC. We monitor our Model Portfolios, for their adherence to a particular investment strategy, but we do not monitor your account and your Program Sponsor is responsible for monitoring your account. The minimum account size for the Model Portfolios is established by the Program Sponsor.

We offer a limited number of Model Portfolios to Program Sponsors that are then made available to you; HFMC also offers investment advisory services to registered investment companies and certain 529 plans that are discussed more fully in our Form ADV Part 2A.

Questions about the specific Program in which you participate should be directed to the Program Sponsor or your financial professional. For additional information about our services, please see our Form ADV Part 2A, in particular Items 4, 5, 7 and 16 which can be found at <https://adviserinfo.sec.gov/firm/summary/147746>.

***Ask the Program Sponsor and/or your financial professional:*** *Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

### **ITEM 3 – FEES, CONFLICTS and STANDARDS OF CONDUCT**

#### ***What fees will I pay?***

For our equity model portfolios, we do not charge you directly. We have a fee arrangement where the Program Sponsors pay us a portion of the asset-based fee that they charge you. Charging an asset-based fee creates an incentive to encourage you to increase assets in your account, as more assets means more fees. For our asset allocation models, we do not charge you directly, nor do we receive any compensation from the Program Sponsor. Our asset allocation model portfolios invest in certain affiliated mutual funds or exchange traded funds, and we do receive investment management fees based upon these assets. We believe our conflict is mitigated as it is your Program Sponsor or financial professional that is responsible for deciding whether the Model Portfolios are right for you, and we do not provide you with any advice as to amount to invest or allocate to our Model Portfolios.

It is typical for Programs to include most transaction costs and fees to a broker-dealer or bank that has custody of your assets, and therefore the fees are typically higher than an asset-based advisory fee alone, however, you may be charged other fees and costs related to your account. For details about the asset-based fee you pay to the Program Sponsor, you may speak with your financial professional or the Program Sponsor and review their disclosure.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information, please see our Form ADV Part 2A, in particular Item 5, which can be found at <https://adviserinfo.sec.gov/firm/summary/147746>.

**Ask the Program Sponsor and/or your financial professional:** Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

**When we act as your investment adviser,** we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- Non-affiliated Model Providers: We rely on non-affiliated Model Providers to create and maintain our equity Model Portfolios, and these Model Providers also act as sub-advisers to HFMC's funds with a similar investment objective. The processes for recommending and communicating such recommendations are separate, and the advice can differ. However, when similar trades are recommended for both the Model Portfolios and the HFMC funds, the communication will be contemporaneous.
  - Trade rotation: To the extent that multiple Programs utilize the same Model Portfolio(s), we seek to rotate the delivery of Model Portfolio changes (e.g., adjustments to holdings, weightings) to Program Sponsors in a fair and equitable manner based on a random rotation process. Each Program Sponsor is responsible for whether, when and how to implement changes across relevant Program accounts. HFMC communicates changes to its Program Sponsors prior to communicating them to custodians of HFMC's proprietary accounts that use the same Model Portfolios.

For additional information on our practices and potential conflicts please see our Form ADV Part 2A brochure, in particular Items 4, 5, 6, 10, 11, 12, and 17, which can be found at <https://adviserinfo.sec.gov/firm/summary/147746>.

**Ask the Program Sponsor and/or your financial professional:** How might these conflicts of interest affect me, and how will you address them?

**How do your financial professionals make money?**

Our professionals are paid a salary and eligible for employer sponsored benefits. Investment professionals are eligible for discretionary incentive compensation and long-term equity awards based upon a number of factors, including performance against individual (including investment performance) and firm objectives, and demonstration of Hartford Funds' valued behaviors. Our sales professionals are also eligible for formulaic and discretionary incentive compensation and long-term equity awards based upon a number of factors, including gross sales, organic growth, market share, and compliance standing.

#### **ITEM 4 – DISCIPLINARY HISTORY**

**Do you or your financial professionals have legal or disciplinary history?**

No. You can visit [investor.gov/crs](http://investor.gov/crs) for a free and simple search tool to research us and our financial professionals.

**Ask the Program Sponsor and/or your financial professional:** As a financial professional, do you have any disciplinary history? For what type of conduct?

#### **ITEM 5 - Additional Information**

For additional up-to-date information about our services, or if you wish to request a copy of the relationship summary, please contact us at [HartfordFundsSupportMailing@hartfordfunds.com](mailto:HartfordFundsSupportMailing@hartfordfunds.com).

**Ask the Program Sponsor and/or your financial professional:** Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?