

Corporate Forms and Policies

Business and Personal Conduct Conflicts of Interest Policy

Geographic Coverage	Global
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Policy Philosophy & Purpose

Business decisions must be made with integrity and not influenced by conflicts of interest. As a company known for delivering actionable, objective insights to executives and their teams, it is important that Gartner associates recognize that sometimes personal interests may hinder their objectivity.

A [Conflict of Interest](#) occurs when an associate's personal interests - family, friendships, financial - compromise the associate's judgment, decisions, or actions at work. Actual conflicts of interest are prohibited. A potential conflict of interest exists when it appears that an associate's interests conflict with Gartner's interests, but disclosing that potential conflict, seeking approval, and complying with guardrails implemented to eliminate the conflict address the situation.

Scope and Applicability

This policy applies to every Gartner associate ("Associates"). In certain cases, it may impact Gartner associates' [Immediate Families](#) and [Relatives](#).^{*} See the Definitions Section to learn how Gartner defines these groups and other capitalized terms in this policy.

Policy Detail

Disclosure and Approval Process

All associates with a conflict of interest (either an actual or a potential conflict) must disclose on this [form](#). The disclosure will be reviewed by relevant teams, including Gartner's Compliance team, and approval will be provided based on this policy.

Common Conflicts of Interest

The following are examples of common conflicts of interest; it is **not an exhaustive list**. Even if a particular situation is not expressly mentioned, it may be a conflict of interest and associates should self-report on this [form](#).

Financial Interests

Competitors

Associates may not have a [Financial Interest](#) in an entity that competes with Gartner and may not use confidential information to drive investment decisions. Doing so may violate insider trading laws, which is illegal.

Companies in Industries Evaluated by Gartner

The following associates are subject to [Financial Interest](#) restrictions based on their roles.

Operating Committee

Members of Gartner's Operating Committee (OC) may not have a [Financial Interest](#) in any entity that is evaluated by Gartner or over which an OC member may exert an influence by virtue of their role at Gartner.

Business and Technology Insights

Business and Technology Insights (BTI) associates who evaluate products or services or make product or service recommendations, their Team Managers (TM), and members of their [Immediate Family](#), may not have a [Financial Interest](#) in any entity within their coverage area.

If such a BTI associate or TM's [Relative](#) is employed by an entity in their coverage area, the associate or TM must promptly notify their manager, disclose this on this [form](#), and also make the appropriate disclosure as part of the Annual BTI Associate Attestation.

Consulting

Consulting associates who evaluate products or services as part of fulfilling engagements or supervise such engagements¹, and members of their [Immediate Families](#), may not have a [Financial Interest](#) in any company whose products or services they evaluate in the engagements they participate in or supervise.

If such a Consulting associate's [Relative](#) is employed by an entity included, or an entity that may be included, in the evaluation, the consulting associate must promptly notify their manager, disclose this on this [form](#), and also make the appropriate disclosure as part of the Annual Consulting Attestation.

Suppliers

If an associate is in a position to influence supplier decisions (or can be perceived to influence supplier decisions), neither that associate nor members of that associate's [Immediate Family](#) may have a [Financial Interest](#) in any entity that does or seeks to do business with Gartner and must promptly disclose this on this [form](#). While associates in Procurement (and those who supervise them) are the associates typically affected by this rule, it applies to any associate who participates in purchasing decisions.

Further, unless previously agreed upon, it is important that all associates do not share, endorse, opine on, or become a testimonial for or otherwise disclose any of Gartner's suppliers. To do so could imply endorsement or disparagement, which could jeopardize Gartner's independence and objectivity.

Without prior approval, associates may not enter into agreements on behalf of Gartner with any outside entity if they know that the entity is a "related party" to a Gartner associate (that is, the contract would financially benefit, either directly or indirectly, an associate or their [Relatives](#)). For example, Procurement associates may not negotiate the purchase of office equipment for Gartner when they know that an associate's mother owns this office-equipment provider.

Gifts and Entertainment

Giving and receiving [Gifts](#), and exchanging other customary business courtesies and entertainment of nominal value with Gartner clients, providers, and organizations covered in published content are only allowed when they comply with Gartner's Gift Policy and Global Travel and Expense Policy (i.e., infrequent, not lavish, within monetary threshold) because Gartner never makes, nor wants to give the perception that it makes, business decisions based on the [Gifts](#) or entertainment associates may receive. Giving and receiving lavish or excessive [Gifts](#), as well as providing or accepting lavish or excessive [Hospitality](#) to or from Gartner prospects, clients, suppliers, or other providers with whom Gartner conducts business may violate global anti-bribery and anti-corruption laws and Gartner's corporate policies. (See the [Anti-Bribery Policy](#).)

Organizational Conflicts of Interest

Organizational conflict of interest means— that because of other activities or relationships with other persons, a person is unable or potentially unable to render impartial assistance or advice to the Government, or the person's objectivity in performing the contract work is or might be otherwise impaired, or a person has an unfair competitive advantage.

An organizational conflict of interest may result when factors create an actual or potential conflict of interest on an instant contract, or when the nature of the work to be performed on the instant contract creates an actual or potential conflict of interest on a future acquisition. In the latter case, some restrictions on future activities of the contractor may be required. (See the [United States Federal State and Local Government Sales & Contracting Policy](#).)

Outside Activities

Participation in activities outside of work must be done at the associates' expense and on their own time. Associates may not use Gartner's products, influence, facilities, or other resources for their personal benefit or the benefit of any outside entity, company or organization. Other criteria may apply based on the associate's role or Business Unit (BU).

Authoring books or other publications (including open-source contributions)

Associates may write books unrelated to their work at Gartner (for example, writing a children's book or a book on sewing) without approval. However, while employed at Gartner, associates may not independently publish books, articles, or any other publications on topics evaluated by Gartner.

Open-source contributions are permissible, as long as they:

1. Have their own standalone source code repository;
2. Don't reuse or rely on Gartner code that cannot be open sourced; and
3. Don't facilitate illegal activities (for example, crypto mixers).

Non-profit Board of Directors / Advisory Board of Directors & Volunteer activities

Participating on non-profit boards and in non-profit volunteering activities do not require approval, except for non-profit industry/[Trade Associations and political non-profits](#), which associates must submit a request on this [form](#). If approved, Associates' participation as officers, directors, advisors, or committee chairperson/members of a non-profit organization is in their individual capacities, is not on behalf of Gartner, and any views expressed are their own (associates are responsible for ensuring the non-profit boards understand this).

Any outside employment or joining a For-profit Board of Directors or Advisory Board of Directors

Associates seeking employment outside of Gartner, or those wishing to serve as officers, directors, advisors, partners, or owners with any for-profit entity, must first have their manager's written approval. Approval will not be given if the organization:

1. Competes, directly or indirectly, with Gartner or any of its products or services; for example, offers strategic, objective insight to executives and

their teams, or writes insights for consumers to make informed purchasing decisions;

2. Manufacturers, markets, or distributes products or services that Gartner evaluates to help clients make decisions, or such coverage is planned soon;
3. Conflicts, or appears to conflict, with the interests of Gartner or damages Gartner's reputation; for example, the outside employment involves the same skills or is closely related to the associate's work at Gartner; or
4. Requires significant time during working hours.

Associates engaged in any outside employment may not:

1. Use Gartner resources; or
2. Solicit associates, clients or prospects (i.e., no cross-pollination).

Associates must disclose these activities on this [form](#).

Political Contributions

Political contributions include anything of value given to a political candidate, political committee, political party, or ballot measure committee. Associates and members of the Gartner Board of Directors ("Board Member(s)") are not permitted to make or solicit political contributions, including in-kind contributions, on behalf of Gartner or using Gartner resources. Gartner will not pay for or reimburse Associates' political contributions.

Outside the United States

Associates and Board Members are permitted to make personal political contributions at their own expense, in their own name, and without using Gartner resources, as long as there is no expectation of any *quid pro quo* or of a business benefit to the Associate, Board Member, or Gartner in return, and as long as the donation complies with applicable law.

In the United States

Associates and Board Members are permitted to make personal political contributions to federal campaigns of candidates who do not currently hold state or local office. This is permitted at their own expense, in their own name, without using Gartner resources, as long as there is no expectation of any *quid pro quo* or of a business benefit to the Associate, Board Member, or Gartner in return.

Given Gartner's status as a government contractor, Board Members, the OC, OC-1's, and certain Sales, and Consulting associates aligned to public sector clients must receive written pre-approval by the Chief Legal Officer or his delegate before they (or a member of their Immediate Families) make personal political contributions or solicit others to contribute (such as by being listed as a host or co-host for a political

fundraising event) to any of the following candidates, committees, or political organizations:

- A candidate for state or local office in the U.S. (e.g., Governor, State Treasurer, state legislature, mayor, city council);
- A candidate for federal political office in the U.S. who currently holds state or local elective office (e.g., a sitting Governor running for U.S. Senate or a mayor running for U.S. Congress);
- A state or local political party committee;
- A state or local political committee;
- A state or local ballot measure committee;
- Section 527 political organization registered with the Internal Revenue Service;
- A federal, state, or local independent expenditure committee (so-called “super PAC”).

Board Members and Associates listed in the preceding paragraph may also not serve as an officer or board member of a political committee, or otherwise exercise control over any political committee, unless pre-approved in writing by the Chief Legal Officer or his delegate. They may disclose these activities on this [form](#).

Failure to disclose and obtain pre-approval is a violation of this Policy, may violate, or appear to violate, anti-corruption laws (see the [Anti-Bribery Policy](#)), and may subject these associates to disciplinary action including termination of employment.

Public Office

Prior to pursuing an elected or other appointed public office, associates must obtain written approval from their manager and submit a request on this [form](#). Unless required by law, Gartner will not pay for time spent running for public office, serving as an elected official, or campaigning for a political candidate. Associates are responsible for making it clear that their positions are personal and are not made on behalf of Gartner.

Public Speaking

Some associates, including BTI associates, Consultants, Executive Partners, and Leadership Partners, create intellectual capital that is sold to Gartner clients. For that reason, when they speak at public forums on topics evaluated by BTI, their opinions should align with the respective published content. Associates in these roles should submit a request to speak publicly on this [form](#).

Associates in other roles may speak at public forums in a personal capacity and do not need to seek approval; however, they are responsible for making it clear that any opinions expressed are their personal views and do not represent the views of Gartner.

Reciprocal and Self-Dealing

Associates may not condition Gartner's decision to purchase a supplier's goods or services on that entity's agreement to purchase Gartner's goods or services. A Gartner supplier may also be a Gartner client, but the decision of both Gartner and the supplier to use each other's goods and services must be made independently.

Personal or Romantic Relationships

Personal or romantic relationships between associates in circumstances where one individual has direct or indirect influence or control over the other's hiring, firing, promotions, performance management, compensation, or other conditions of employment create actual conflicts of interest and are therefore prohibited.

Personal or romantic relationships between associates who are not in a direct or indirect reporting relationship are generally permissible as long as they are consensual and do not negatively affect Gartner's business, the participants' working relationship, or associate dynamics. Gartner expects that associates in a romantic relationship will conduct themselves in a businesslike manner at work and minimize the impact of the relationship in the workplace.

Supervising or Hiring Relatives

Associates may have [Relatives](#) that work for Gartner. No associate may participate in the selection or hiring process of a [Relative](#). The associate may not directly or indirectly supervise a [Relative](#) or use their position to influence or attempt to influence any aspect of a [Relative's](#) employment at Gartner.

Speak Up

If you are concerned that the law or this policy has been or may be violated, it is important that you speak up. If you have a question, are confused, or a situation "just doesn't feel right," it is always better to ask for help.

Speak Up Reporting Channels

These are the reporting channels to use to raise a question or concern:

1. **Talk to your manager.** You can start by talking to your manager. If unable to provide an answer, it's your manager's job to help you find one or escalate a complaint.

2. **Talk to someone outside your team.** You can always talk with any other manager in your business unit or your (or any other) [Human Resources partner](#), or [Legal & Compliance](#).

3. **Contact the Gartner Helpline.** Our third-party helpline allows for anonymous reporting 24 hours a day, 7 days a week, in many different languages. Contact the [Gartner Ethics Helpline](#) — you will find a link to toll-free numbers and a way to report online.

We do not tolerate retaliation

Gartner does not tolerate retaliation of any kind against anyone who reports a concern in good faith. Any associate who engages in retaliatory behavior will be subject to disciplinary action, up to and including termination of employment.

Definitions

Conflict of Interest - A conflict of interest exists if you engage in any personal or business-related activity, including holding a Financial Interest, that (i) could actually or potentially interfere with your responsibilities or judgment on behalf of the company or its clients, or (ii) conflicts, or appears to conflict in any way, with the interests, or damages the reputation, of the company.

Financial Interest is any ownership interest in publicly traded or private companies, or loans from outside organizations (except personal loans, mortgage loans, and similar loans from commercial or savings banks). However, it does not include stocks in mutual funds or exchange traded funds (ETFs), or other forms of ownership as may be pre-approved in writing by Gartner's General Counsel or their designee on a case-by-case basis.

Gifts & Hospitality are things of value provided to a third party. A gift is something of value provided where there is no host. Hospitality includes things of value like meals or entertainment where there is a host. If there is no host, then hospitality becomes a gift.

Immediate Family is an associate's spouse, domestic life partner or equivalent, dependent children or dependent parents. A separated spouse, separated domestic life partner, or equivalent, will be considered part of the associate's Immediate Family if the associate files a joint tax return with the separated spouse.

Relative is a spouse or domestic life partner, parent, child, sibling, grandparent, grandchild, in-law, nephew, niece, cousin, aunt or uncle.

Trade associations consist of businesses that operate in a specific industry.

Further Information

Related Policies

[Anti-Bribery Policy](#)

[Code of Conduct](#)

[Gift Policy](#)

[Global Travel and Expense Policy](#)

[Personal Relationships at Work](#)

[Supplier Feedback Policy](#)

[United States Federal State and Local Government Sales & Contracting Policy](#)

Revision History

Published Date	Reason for Revision
23-May-23	Full policy review and update.
18-Sept-25	Updated Policy Owner Title, Political Contributions, and Speak Up Resources sections
18-Nov-25	Updated R&A references to BTI nomenclature
30-March-26	<ul style="list-style-type: none">• Included Organizational Conflicts of Interest Section• Updated guidance on how associates may invest in Gartner clients.