

# Corporate Forms and Policies

## Business and Personal Conduct Conflicts of Interest Policy

<b>Geographic Coverage</b>	Global
<b>Policy Owner</b>	SVP, General Counsel & Corporate Secretary
<b>Last Reviewed</b>	June 9, 2023

## 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. In certain cases, it may impact Gartner associates' [Immediate Families](#) and [Relatives](#).<sup>\*</sup> 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 via the [Disclosure and Approval Process](#). The disclosure will be reviewed by relevant teams, including Gartner's Ethics & 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 via the [Disclosure and Approval Process](#).

## Financial Interests

- A. Competitors.** Associates may not have a [Financial Interest](#) in an entity that competes with Gartner.
- B. 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.

## Research & Advisory

Research & Advisory (R&A) 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 research coverage area.

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

## Consulting

Consulting associates who evaluate products or services as part of fulfilling engagements or supervise such engagements<sup>1</sup>, 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 in the [Disclosure and Approval Process](#), and also make the appropriate disclosure as part of the Annual Consulting Attestation.

- C. 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 through the [Disclosure and Approval Process](#). While associates in Procurement (and those who

supervise them) are the associates typically affected by this rule, it applies to any associate that 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 research 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](#).)

## **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.
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](#), which associates must submit through the [Disclosure and Approval Process](#). Associates' participation as officers, directors, advisors or committee chairperson/members of a non-profit organization are in their individual capacities, are 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 research 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 via the [Disclosure and Approval Process](#).

## **Political Contributions**

Associates are not authorized to make or approve any contributions or expenditures of company funds or use company facilities, equipment, or supplies to support or oppose political activity in any jurisdiction.

While associates may make personal political contributions, they should never be connected to their work at Gartner and there should never be a *quid pro quo* or suggestion that it was made to influence any business decisions. This can violate not only this policy,

but also may violate, or appear to violate, anti-corruption laws. (See the [Anti-Bribery Policy](#).)

## **Public Office**

Prior to pursuing an elected or other appointed public office, associates must obtain written approval from their manager and submit a request through the [Disclosure and Approval Process](#). 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 ones and are not made on behalf of Gartner.

## **Public Speaking**

Some associates, including R&A 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 R&A, their opinions should align with the respective published research. Associates in these roles should submit a request to speak publicly through the [Disclosure and Approval Process](#).

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, 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 that engages in retaliatory behavior will be subject to disciplinary action, up to and including termination of employment.

## Definitions

Conflicts 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

## Revision History

Published Date	Reason for Revision
09/06/2023	Updated text on open-source contributions

23/05/2023	Full policy review and update.
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