

**Gartner®**

**Gartner  
Australasia PTY  
Limited  
Modern Slavery  
Statement**

FY2025



## Gartner Australasia PTY LTD Modern Slavery Statement

ABN 69 003 708 601

For the reporting period 1 January 2025 to 31 December 2025

### Introduction and single reporting entity

This Modern Slavery Statement (Statement) has been published pursuant to section 13 and 16 of the Modern Slavery Act 2018 (Cth) (Act) for Gartner Australasia Pty Limited ABN 69 003 708 601 (“Gartner Australasia”). This Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to help ensure that slavery and human trafficking are not taking place anywhere in our business. Gartner Australasia fully recognizes that we have a responsibility to be aware of the potential risks in our business, and in our wider supply chain.

### Structure, operations, and supply chains

#### *Structure*

Gartner, Inc. (NYSE: IT, hereinafter Gartner), together with its global subsidiaries, delivers actionable, objective business and technology insights that drive smarter decisions and stronger performance on an organization’s mission-critical priorities. We are a trusted advisor and an objective resource for more than 13,000 enterprises in approximately 90 countries and territories. Gartner delivers its products and services globally through three business segments: Business and Technology Insights (BTI) or “Insights,” Conferences and Consulting, as described below.

**Insights** enables executives and their teams from every major function, geography, industry and sector with actionable, objective insights, guidance and tools. Our analysts deliver proprietary insights that are informed by thoroughly vetted practitioner-sourced and data-driven research to help our clients address their mission-critical priorities.

**Conferences** provides executives and teams across an organization the opportunity to learn, share and network. From our Gartner Symposium/Xpo series, to industry-leading conferences focused on specific business roles and topics, to peer-driven sessions, our offerings enable attendees to experience the best of Gartner insights and guidance.

**Consulting** serves senior executives leading technology-driven strategic initiatives leveraging the power of actionable, objective Gartner insights. Through custom analysis and on-the-ground support we enable optimized technology investments and stronger performance on our clients’ mission-critical priorities.

Gartner Australasia, a proprietary limited company domiciled in Australia is part of the Gartner group of companies sitting under our ultimate parent entity, Gartner, Inc. Gartner Australasia does not have any entities it owns or controls, however, we also conduct business in New Zealand as an overseas

registered branch with the Gartner Office located in New Zealand. Gartner Australasia provides all services provided by Gartner, Inc., except for Consulting Services. Since the inception of Gartner Australasia in 1989, Gartner Australasia's primary focus is to serve its clients and business partners in Australia and New Zealand.

Gartner Australasia is primarily administered from its head office in Sydney, Australia and has 431 associates as of 31 December 2025. .

### **Gartner Australasia Supply Chain**

Gartner Australasia partners with a variety of small- to medium-size suppliers for most of our local requirements, and with multi-national suppliers for items such as technology, infrastructure and real estate. In addition, Gartner's strategy for inclusive procurement identifies potential suppliers, promotes competition and generates economic opportunities for communities.

Most of the goods and services Gartner Australasia procures come from suppliers and contractors that are selected and onboarded by the Gartner, Inc. global procurement team which comprises a 'Source to Contract' team and 'Procure to Pay' team. We leverage a global supply chain to address most of our needs.

There are some local suppliers we work with to support local operations. Gartner Australasia's main categories of local procurement include:

- Property
- Facilities Services
- Office supplies and consumables
- Business travel
- Electronics and technology
- Professional Services
- Conferences venues

### **Risks of modern slavery practices in Gartner Australasia's operations and supply chains**

Gartner Australasia is committed to taking action to assess and manage modern slavery risks on an ongoing basis.

#### *Assessing risk*

With the exception of a portion of the internal IT helpdesk services and third-party conference support providers, Gartner Australasia's services are provided in-house through Gartner associates directly employed by Gartner and are not outsourced or procured elsewhere. This includes delivery of Gartner Business and Technology Insights Services. Gartner Australasia does not sell or provide its

services via agents or resellers. This model provides a high degree of control over our operations and reduces exposure to certain modern slavery risks.

However, we acknowledge that the risks of modern slavery practices may arise in our supply chain, particularly where goods or services may be sourced from higher-risk geographies or sectors. For example, certain products (such as electronic goods and their component parts) that Gartner procures for its business operations, may originate from global supply chains where there is an increased risk of labour exploitation.

Gartner conducts an annual Enterprise Risk Assessment as a method of monitoring these risks. While modern slavery has not been identified as a significant risk at this time, we recognise the risk might exist across all sectors and geographies. Additionally, in a materiality assessment conducted for Gartner, Inc. using a double materiality framework<sup>1</sup>, modern slavery, servitude, human rights abuses or human trafficking were not identified to be material for Gartner<sup>2</sup>. We report materiality assessment results in our annual Corporate Responsibility Report.

Notwithstanding these outputs, we remain vigilant and continue to assess inherent risk factors within our operations and supply chain.

### *Managing risk*

Gartner Australasia undertakes a number of activities to manage the risk of modern slavery:

- To support a work environment that is safe, healthy and free from harassment and retaliation, we encourage stakeholders to report any potential or actual misconduct through the available reporting channels. Gartner offers all internal and external stakeholders a method to report possible misconduct or concerns, including human rights issues. Associates can raise their concerns to their manager, HR partner or Legal & Compliance. In addition, possible misconduct or concerns may be submitted 24/7 by telephone or via the web and anonymously (where permitted by local law) through the [Gartner Ethics Helpline](#), which is administered by an independent third party. All concerns regarding inappropriate behavior, policy violations, or violations of the law may be raised by internal or external stakeholders, in many languages. Information about our Helpline is available on our internal intranet as well as publicly accessible through an external website.
- Gartner has a spend management platform which is the main platform used across all offices for supplier onboarding and requisitioning of goods and services procured from third-party suppliers. One of the platform's benefits is the supplier risk management process, including a

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<sup>1</sup> Using both impact and financial thresholds to determine materiality

<sup>2</sup> The information included in, and any issues identified as material for purposes of, this document may not be considered material for SEC reporting purposes. In the context of this report, the term "material" is distinct from and should not be confused with such term as defined for SEC reporting purposes.

risk check at the time the supplier is set up and continuous monitoring using a risk-based approach. The risk check involves all suppliers that are onboarded to the system being run through sanctions screening process, as described in further detail below.

- Suppliers are required to comply with Gartner's Supplier Code of Conduct as part of the onboarding process and may be subject to additional review depending on the nature of the services provided, geographic exposure and risk profile.
- We apply a risk-based approach to supplier due diligence and ongoing monitoring.

These actions support the development of a sustainable program that helps identify, prevent and mitigate potential risks and reinforces our long-term commitment to eliminating modern slavery. We remain focused on continuous improvement, prioritizing efforts to hold our suppliers to the same high standards we set for ourselves.

## Gartner Policies

Gartner Australasia has a zero-tolerance approach to modern slavery and human trafficking, and we are fully committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Additionally, we have the following policies in place:

[Global Human Rights Policy](#): This policy, available on our public [Policies](#) webpage, underlines Gartner's commitment to human rights in the workplace. This commitment includes respecting the dignity and worth of all employees and providing equal opportunities to all employees. The policy also sets out our commitment to respect international human rights principles outlined in the United Nations Global Compact and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

**Recruitment policies:** Gartner Australasia maintains robust recruitment controls, including conducting background checks for all successful applicants. For individuals who are not Australian or New Zealand citizens, we require evidence of their legal right to work in Australia (e.g. valid visa documentation). These measures help safeguard against human trafficking and forced labour. The organisation primarily uses internal recruitment channels, and where external agencies are engaged (which is rare), appropriate due diligence is undertaken to verify their practices and ensure alignment with Gartner's standards prior to engagement.

[Global Code of Conduct](#): Gartner maintains a global Code of Conduct. This Code, available in multiple languages, documents the way we expect associates to conduct themselves in dealings with those we serve – both outside and inside the company. Gartner requires core compliance training (Code of Conduct Training Program) at the time of hire. Additionally, our associates (full-time and part-time) are assigned mandatory compliance training throughout their employment with Gartner.

[Supplier Code of Conduct](#): Gartner requires that suppliers (including the supplier's employees, representatives and subcontractors/suppliers) comply with our Supplier Code of Conduct. Provided

during the onboarding, the Code requires suppliers to commit to conducting business in an ethical and honest manner and in compliance with all applicable laws and regulations. The Code details our expectations with regards to fair labor practices, including with respect to wages, the protection of human rights, and strictly forbids all forms of slave labour.

## Due diligence

As part of our supplier onboarding process, Gartner conducts sanctions screenings on suppliers and additional due diligence as appropriate to ensure that suppliers meet our standards. Sanction screening involves checking the names of actual and potential suppliers against watchlists to ensure that Gartner does not do business with any entity either in a sanctioned country or on a list of entities with which Gartner is legally prohibited from doing business. We also do sanction screenings on other third parties, including clients.

Gartner also maintains multiple reporting channels through which associates and external stakeholders may raise concerns, including those related to human rights and modern slavery. When concerns are raised, they are investigated thoroughly and confidentially through our established processes for handling reports. Any person accused of wrongdoing will be treated fairly and objectively. When a concern is substantiated, prompt remedial action is taken in coordination with the relevant functions. Additionally, our Helpline processes are subject to independent annual review by an external third-party auditor.

## Training

We believe that doing the right thing is always the right approach, which is why we require ongoing training for all associates to understand the laws, rules and expected behaviors to perform their jobs. Gartner associates are required to complete an annual Code of Conduct affirmation as part of the ongoing Compliance Training Programme in place for our associates. The Code of Conduct covers such topics as human rights protection and provides a link to Gartner's Modern Slavery Statement.

## Monitoring and evaluation

In addition to relevant policies and procedures such as those listed above, each year Gartner publishes a [Corporate Responsibility Report](#). The report underlines Gartner's commitment to uphold the highest ethical standards throughout all our global operations. It measures our performance against key corporate responsibility metrics referencing leading reporting frameworks. The report also underlines our commitment to both human rights and responsible procurement.

We have established a Corporate Responsibility Executive Council to oversee corporate responsibility programs and provide guidance to the Operating Committee (our executive leadership team) on these issues. For further information on our corporate responsibility governance, please see our [Corporate Responsibility Report](#).

Gartner's key performances for 2025 include but are not limited to:

- 98% of associates completed annual Gartner Code of Conduct training

- 100% of suppliers onboarded through Gartner’s spend management platform affirm either Gartner’s Supplier Code of Conduct or a Gartner approved alternative
- Zero substantiated allegations against Gartner Australasia related to human rights reported through the Gartner Ethics Helpline

### *Assessing the effectiveness of our actions*

During this reporting period, we have undertaken procedures outlined here and have no reason to believe that these actions are not effective. If any activities involving either us or our supply chain that would give concern in relation to modern slavery or human trafficking was highlighted to Gartner Australasia, we would promptly take action in accordance with the legal obligations and our Code of Conduct.


### **Any other relevant information**

#### Other reporting obligations

Gartner, Inc. has reported under the United Kingdom Modern Slavery Act 2015. We consider the implementation of these reporting regimes as important developments in combating modern slavery and human trafficking around the world.

### **Approval**

This Statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and constitutes Gartner Australasia's statement for the reporting period 1 January 2025 to 31 December 2025. This Statement is signed by Karoline Elizabeth Bonacci in her role as Director of Gartner Australasia Pty Limited and was approved by the Board of Directors of Gartner on 23 June 2026, in compliance with section 16 of the Act. It will be reviewed and updated annually.

DocuSigned by:  
  
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Karoline Elizabeth Bonacci

Director of Gartner Australasia Pty Limited

23 June 2026