



Gartner Norge AS

Norwegian Transparency Act Response

Gartner Norge AS is a wholly-owned subsidiary of Gartner, Inc. ("Gartner").

Gartner, Inc. (NYSE: IT), together with its global subsidiaries is the world's leading research and advisory company. Gartner delivers actionable, objective insight that drives smarter decisions and stronger performance on an organization's mission critical priorities. We are a trusted advisor and an objective resource for close to 14,000 enterprises in approximately 90 countries and territories — across all major functions, in every industry and enterprise size.

Gartner is committed to the prevention of modern slavery and human trafficking in our supply chains or in any part of our business. We ensure to act ethically and with integrity in all our business relationships and to develop and maintain effective systems and controls to prevent the mistreatment of people within our business or supply chain.

Gartner respects the dignity and worth of all employees, as set forth in our global [Human Rights Policy](#). Gartner is an equal opportunity employer and recruits, hires, trains, promotes, compensates and administers all personnel actions without regard to any legally-protected status. 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.

We hold our suppliers to the same high standards to which we hold ourselves. Our [Supplier Code of Conduct](#) details our expectations with respect to labor practices and human rights including provisions for:

- Equal employment opportunity
- Respect and fair treatment
- Safe, secure and healthy working conditions
- Employment eligibility, voluntary labor and modern slavery

We require that our suppliers (including their employees, representatives and subcontractors/suppliers) comply with this Supplier Code of Conduct. The Code requires suppliers to commit to conducting business in an ethical and honest manner and in compliance with all applicable laws and regulations, while furthering values of inclusion, respect and integrity. The Code strictly forbids all forms of slave labour. We use a Third-Party Risk Management (TPRM) solution when

onboarding new suppliers and to perform ongoing monitoring of existing suppliers for any adverse news.

In addition to the Human Rights Policy and Supplier Code of Conduct, Gartner has a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include:

Recruitment Policies

Gartner maintains robust recruitment policies, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. We use our internal recruiters to source labor, and on the rare occasion when we use an external agency, we always verify the practices of any new agency before accepting workers from that agency.

Gartner Helpline

Gartner maintains a global helpline which is administered by an independent third party 24 hours a day, seven days a week. All concerns regarding inappropriate behavior, policy violations or violations of the law may be raised anonymously, in many languages, on this helpline.

Global Code of Conduct

Gartner has a global Code of Conduct. This Code explains the manner in which Gartner behaves as an organization and how we expect our employees to act.

Workplace Equality

Gartner is committed to operating with the highest ethical standards and fostering an environment that encourages open discussions and ensures our associates and clients are treated fairly and with respect. Our inclusion strategy focuses on embedding inclusive practices into our organization through the lens of hiring, engaging and advancing talent. We work to integrate best-in-class inclusive approaches into all our talent processes and practices, and prioritize efforts that support our world-class talent and their unique needs. Gartner adheres to a pay-for-performance compensation model; our goal is to deliver equal pay for associates in equivalent roles, with similar experience and responsibility, delivering similar levels of performance.

Workplace Safety

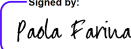
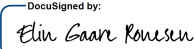
Gartner’s Oslo Norway facility is based at the following address: Third Floor, Karenslyst Allé 57, Skøyen 0277, Oslo. As with all Gartner’s global locations, this facility is subject to Gartner’s Global Safety Management Systems and policies.

The Oslo site was last subject to an internal workplace risk assessment in August 2023 and is due for review in August 2025. A copy of this document is available upon request.

Corporate Responsibility

Gartner has established a Corporate Responsibility Executive Council to oversee all corporate responsibility programs, monitor the environmental impact of Gartner operations and provide guidance to the Operating Committee (Gartner’s executive leadership team) on corporate responsibility issues. Additionally, the Governance/Nominating Committee of Gartner’s Board of Directors is responsible for overseeing and periodically reviewing the company’s corporate responsibility priorities and initiatives, taking into consideration the impact on internal and external stakeholders. Gartner’s full Board of Directors annually reviews Gartner’s approach and progress on corporate responsibility. Furthermore, at the corporate level, each year we publish our Corporate Responsibility Report. The report underlines Gartner’s commitment to uphold the highest ethical standards throughout all our global operations. It also details our approach to responsible procurement, and compensation and benefits. Our commitment to continuous improvement in our approach to corporate responsibility remains steadfast.

Signatures

Name	Title	Signature	Date
Paola Farina	MVP, Assistant Controller	<div>Signed by: </div>	23-VI-2025
Elin Ronesen	MVP, Legal Counsel	<div>DocuSigned by: </div>	23-Jun-2025