

Dear Valued Supplier,

Gartner is committed to conducting business in an ethical and honest manner and in compliance with all applicable laws and regulations, while furthering its values of diversity, inclusion, respect, integrity and Corporate Social Responsibility (CSR). Toward that goal, Gartner endeavors to choose reputable suppliers which conduct their business in a manner that shows such a commitment.

To ensure consistency and mutual commitment, Gartner requires that our suppliers (including their employees, representatives and subcontractors/suppliers) comply with this Supplier Code of Conduct ("Supplier Code"). This Supplier Code does not replace specific contractual requirements. If a contractual term is stricter than this Supplier Code, the supplier must meet the stricter contractual requirement. Further, supplier actions must be highly ethical regardless of whether the Supplier Code and/or supplier policies specifically address a situation.

Gartner Supplier Code of Conduct

Labor Practices and Human Rights

Gartner is committed to a work environment that values diversity, inclusion, respect, integrity and CSR.

Equal Employment Opportunity. Suppliers are expected to provide equal employment opportunities to all of their applicants, employees, and sub-contractors without discrimination or regard to race, color, creed, religion, sex, sexual orientation, gender identity, marital status, citizenship status, age, national origin, ancestry, disability, veteran status, or any other legally protected status and to affirmatively seek to advance the principles of equal employment opportunity.

Respect and Fair Treatment. Suppliers are expected to maintain a workplace where business activities are conducted with respect and where treatment is fair including with respect to wages, working hours and benefits. Suppliers should comply with all applicable laws and regulations on nondiscrimination and anti-harassment in hiring and employment. Suppliers shall comply with all applicable legal and regulatory requirements and will generally apply sound employee relations practices. Working hours, wages and benefits will be consistent with statutory and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation and legally mandated benefits. This includes no wage deductions as a disciplinary measure, written documentation being made available to workers and payment of overtime at a premium/higher rate.

Provide Safe, Secure and Healthy Working Conditions. Suppliers are expected to promote safe, secure and healthy workplaces. Suppliers should have policies and practices in place to ensure the health and safety of their employees and take all necessary steps to provide a safe and secure working environment. Suppliers shall proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry. Also, suppliers shall provide

potable drinking water and adequate restrooms; fire exits and essential fire safety equipment; emergency aid kits and access to emergency response including environmental, fire and medical.

Employment Eligibility, Voluntary Labor and Modern Slavery. Gartner is committed to the principles outlined in the United Nations Global Compact and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and requires our suppliers to commit to this as well. Suppliers shall only employ workers with a legal right to work. Illegal child labor and forced labor (including prison labor, indentured labor, bonded labor, or slave labor) are forbidden in any circumstance. Suppliers must comply with all applicable modern slavery laws, statutes, regulations and codes in force and take reasonable steps to ensure that there is no modern slavery or human trafficking in its or its subcontractors' supply chains or business operations.

Business Practices

Protecting Gartner confidential information and ensuring good practices in privacy and data security is integral to our business and reputation.

Privacy. Suppliers shall comply in all respects with applicable data protection and privacy legislation and never disclose Personal Information to anyone outside of Gartner except as permitted by law and in the proper conduct of our business, where disclosure is required by legal process or with Gartner's legal approval. Suppliers shall adhere to the Gartner Privacy Policy, the most updated version of which is available at <https://www.gartner.com/en/about/policies/privacy>.

Communications. Suppliers may not publish any marketing materials, press releases or media interviews that include a reference to Gartner, its clients, or the work being completed together without Gartner's prior written approval.

Confidential and Proprietary Information. Suppliers must protect Gartner confidential and proprietary information and act to prevent its misuse, theft, fraud or improper disclosure. Suppliers must take all due care in handling, discussing or transmitting confidential or proprietary information that could affect Gartner, its employees, its clients, the business community or the general public.

Intellectual Property. Suppliers must safeguard and take necessary steps to protect Gartner's and its clients' proprietary intellectual property, even if it is public. This includes trademarks, patents, copyrights, inventions and other proprietary works. Suppliers must only use such intellectual property for the purposes authorized in a contractual agreement. If you are uncertain about a proposed use of Gartner's or its clients' intellectual property, seek Gartner guidance.

Business Records. Suppliers shall maintain accurate and complete business records on all matters related to supplier's business with Gartner. Suppliers shall provide such business records to Gartner upon request.

Inside Information and Insider Trading. Suppliers who gain access to any material, nonpublic information about Gartner, our clients or business partners while working with Gartner must not share that information with others or use it for market trading or to tip anyone else in market trading.

Corporate Social Responsibility (CSR)

- **Sustainability:** Gartner's commitment to continuous improvement in our approach to sustainability remains steadfast. To accelerate our progress toward decarbonization, Gartner has committed to achieve net-zero greenhouse gas emissions by 2035 in alignment with the Science Based Target Initiative (SBTi) Net-Zero Standard. Suppliers shall carry out operations with care for the environment and comply with all applicable environmental laws and regulations. The potential environmental impacts of daily business decision-making processes should be considered along with opportunities for conservation of natural resources, recycling, source reduction and pollution control to ensure cleaner air and water and to reduce landfill wastes.
- **Supplier Diversity/Small Business:** Gartner believes a diverse global supplier base is important to our business. Suppliers shall use reasonable efforts to engage small, socioeconomically disadvantaged and diverse suppliers including disabled-owned, LGBTE-owned, minority-owned, veteran owned and women-owned businesses to support the Supplier's overall business operations. In the U.S., Suppliers shall also make reasonable efforts to engage small businesses as defined by the [United States Small Business Administration](#) (including small business subcategories such as small disadvantaged businesses, small women-owned businesses, veteran-owned businesses, service disabled veteran-owned businesses and HUBZone businesses) to support the Supplier's general business operations. Suppliers fitting these classifications shall identify their classification status to Gartner and provide copies of any certifications.

Business Relationships and Integrity

Gartner requires its Suppliers to conduct their business as Gartner strives to conduct its business: in a fair, responsible manner, with integrity and high ethical standards, and in compliance with the laws and regulations.

Anti-bribery and Anti-Corruption. Suppliers must never offer, promise, make, or authorize any payment, bribe or thing of value in connection with Gartner business. Suppliers must comply with all applicable anti-bribery and anti-corruption laws in the countries/regions where we operate, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

Anti-Money Laundering and Tax Evasion Controls. Suppliers must comply with all international laws on anti-money laundering and all applicable tax laws in the countries/regions where we operate, including, but not limited to, the U.K. Criminal Finances Act and all U.S. laws relating to the proceeds of criminal activity.

Financial Records. Suppliers must maintain financial records according to applicable laws and regulations.

Competition. Suppliers must comply with all applicable laws regarding fair competition and antitrust.

Conflicts of Interest. Suppliers are expected to report to Gartner any situation that may appear as a conflict of interest, and disclose to Gartner if any Gartner associate or professional under contract with Gartner may have an interest of any kind in supplier's business, any kind of economic ties with the Supplier, or any other potential conflict of interest.

Gifts or Other Benefits. Suppliers should have in place a thoughtful policy on gifts and entertainment practices. Bribes or inappropriate luxury gifts to Gartner associates are prohibited, regardless of local custom. Furthermore, suppliers must not offer entertainment or gifts to government officials — or make direct or indirect political or

charitable contributions — on Gartner’s behalf. Providing Gartner employees with cash or cash equivalent of any kind is strictly prohibited. Acceptable forms of entertainment may include infrequent gifts of nominal value or non-lavish hospitality as part of supplier relationships. Unacceptable forms of entertainment include gambling expenses or sexually explicit entertainment. Suppliers must refrain from extending any gifts or other benefits to Gartner employees during the period of any sourcing event (example: a Request for Proposal, bid or Request for Information) or contract negotiation to protect the integrity and reputation of Gartner and our Suppliers.

Trade Sanctions and Export Controls. Suppliers must comply with all applicable trade and export control laws.

Employee Associations and Worker Organizations. Respect employees’ right to freedom of association and collective bargaining, consistent with local laws. Consistent with applicable law, Gartner suppliers shall respect employees’ rights to join or refrain from joining associations and worker organizations. Suppliers should also not prohibit the establishment of means to facilitate freedom of association and collective bargaining in situations where they are restricted under law (works councils for example).

Compliance and Reporting Misconduct

Accountability and Compliance. Suppliers must comply with this Supplier Code and the laws. Suppliers shall be responsible for any monitoring or documenting of their compliance and their efforts to promote compliance within their supply chains. Gartner reserves the right to investigate any instances of a supplier’s noncompliance of which it becomes aware. Noncompliance may be grounds for Gartner to void or terminate contractual obligations with a supplier.

Reporting. Suppliers who believe that a Gartner associate or anyone acting on behalf of Gartner has engaged in illegal or otherwise improper conduct with respect to their business with the supplier should report the matter to Gartner. Good faith reports should be made to the Gartner Ethics Helpline by visiting gartner.ethicspoint.com. Reports to the Gartner Ethics Helpline are kept confidential to the extent possible, may be made anonymously where permitted by local law, and may be made in local language. Suppliers should also report any potential violation of the Supplier Code of Conduct. Reports may be made through GartnerSupplierReporting@gartner.com. A supplier’s relationship with Gartner will not be affected by an honest report of potential misconduct.

- **End of Gartner Supplier Code of Conduct** -