



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 and integrity. 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) 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, and integrity.

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 on non-discrimination 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, benefits will be consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation, and legally mandated benefits.

Safety, Security, and Sustainability. Suppliers are expected to promote safe and secure 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 working environment. Suppliers must also comply with all applicable environmental laws and consider how business decisions affect the environment.

Employment Eligibility and Voluntary Labor. 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.

Appropriate Work Hours and Wages. Suppliers must comply with applicable laws on work hours and overtime, as well as applicable laws on wages and benefits.

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. Supplier shall adhere to the Gartner Privacy Principles, the most updated version of which is available at http://www.gartner.com/technology/about/policies/privacy_principles.jsp.

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

Inside Information and Insider Trading. Suppliers who gain access to any material, non-public 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.

Provide Safe and Healthy Working Conditions. Supplier shall proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are prevented. Supplier must implement management systems and controls that identify hazards and assess and control risk related to their specific industry. Also, supplier 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.

Corporate Social Responsibility. 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.

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 law.

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

Anti-Money Laundering and Tax Evasion Controls. Suppliers are expected to comply with all international laws on anti-money laundering and all applicable tax laws in the countries 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.

Competition. Suppliers will 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 or any kind of economic ties with the Supplier.

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 contributions—on Gartner's behalf.

Trade Sanctions and Export Controls. Gartner complies with all international trade laws and regulations, including U.S. trade sanctions, and we expect suppliers to comply with all trade and export control laws that apply to their work with Gartner.

Supplier Diversity. Encouraging inclusion, Supplier shall endeavor to include small and socioeconomically diverse suppliers in sourcing subcontracting activities where possible.

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.

Compliance and Reporting Misconduct

Accountability and Compliance. Supplier 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 non-compliance of which it becomes aware. Non-compliance 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. Suppliers should also report any potential violation of the Supplier Code. 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.