

Code of Conduct



Dear Colleagues:

Every day, business leaders around the world look to Gartner for help making critical decisions against a backdrop of rapid, technology-driven change. We sit at the intersection of business and technology. Our insights, advice and tools often mean the difference between success and failure for our clients. This unique position makes us a force for good in the world and gives us a unique opportunity to have a positive and long-lasting impact. And as we grow, our global impact continues to expand.

With this growth comes great responsibility. As part of our duty to our clients, our associates and our great company, we have an imperative to consistently uphold the highest levels of integrity in everything we do.

Integrity is a commitment to the highest ethical standards. It's about how we do the right things — accurately, authentically and truthfully. And it's a behavior-based virtue that continuously builds and improves over time.

The Gartner Code of Conduct is the guide for how we expect associates to conduct themselves in dealings with the communities we serve — both outside and inside the company. Our leaders across the organization and our board of directors embrace the Code of Conduct because it protects and advances our greatest assets: Our people and our brand.

We must each understand and comply with the Gartner Code of Conduct. Each year, you are asked to affirm that you have read, understand and comply with the Code.

If you have questions, please ask for guidance. We urge you to raise any concerns related to inappropriate behavior, questionable business practices or possible misconduct. If you encounter a situation that you believe violates the Code or any other Gartner policy, report it through the channels outlined in this Code. You have my assurance there will be no retaliation for asking questions or raising good-faith concerns.

Thank you for your continued commitment to Gartner and our world-class work environment.

Sincerely,



Gene Hall, CEO



Uphold our standards

Speak up and report concerns

Associates: Your voice matters

Part of participating in a culture of integrity is being willing to speak up when something doesn't seem right.

If you believe the law, this Code or our policies have been violated, or are about to be violated, it's important that you speak up.

Even if you only have a question about a new policy, a confusing process or a situation that "just didn't feel right," it is always better to ask for help.

Three ways to ask for help or report a 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.

2. Talk to someone outside your team

If you don't feel comfortable talking with your manager or feel your manager didn't help you resolve your issue, you can always raise your concern with any other manager in your business unit, your (or any other) [Human Resources partner](#) or the [Office of the Ombudsman](#).

3. Contact the Gartner Hotline

Our third-party hotline allows for **anonymous** reporting 24 hours a day, 7 days a week. Contact the [Gartner hotline](#) — you will find a link to toll-free numbers in 38 countries and a way to report online.

Uphold our standards

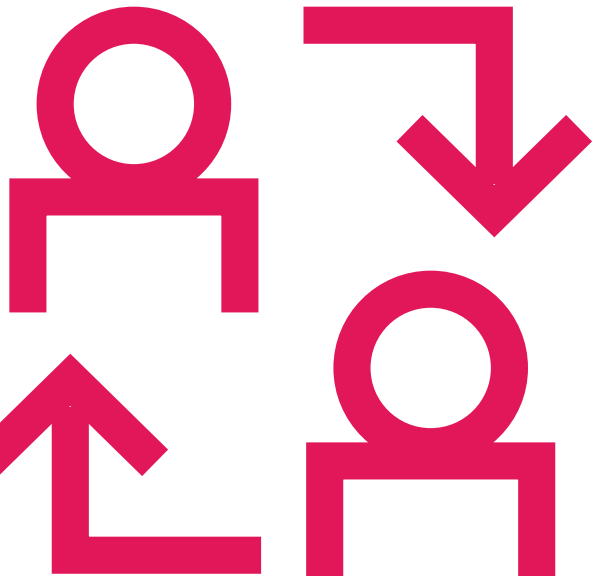
Speak up and report concerns

Managers: Listen and act

If someone comes to you with a concern, you have a special responsibility to listen and act. Handling concerns appropriately is critical to preserving trust and protecting Gartner.

As a manager, it's natural to want to take ownership of your team. Keep in mind that you will often need to escalate cases where concerns about business ethics or misconduct arise.

If you have a question, or aren't sure whether you can or should resolve the issue yourself, you can always email your [HR partner](#) or the [Office of the Ombudsman](#) for advice.



When associates raise a concern, managers need to:

Remove distractions and listen.

Remember that by speaking up, this associate has just done something difficult and very important for the company.

Respond respectfully.

Thank the person for speaking up, even if you disagree. Show that you're focused on resolving the issue.

Maintain confidentiality.

To the extent possible, protect the associate's privacy. Avoid discussing the conversation with others on your team.

Reach out to an HR partner.

Your HR partner can advise you on whether and how to escalate.

Protect our independence

Identify and address conflicts

Avoid potential conflicts

Gartner provides a path for all associates to be the best version of themselves. Along the way, it's important to stay mindful of potential conflicts, both real and perceived.

We are free to develop our careers with resources inside and outside of Gartner. However, some activities may run counter to the welfare of our company. These activities are known as conflicts of interest and should not be pursued.

Full disclosure is best

When managing or resolving conflicts, transparency is key. Don't wait until a potential conflict materializes before you bring it forward. Get advice before you take action. It's easy to do by reaching out to the [Office of the Ombudsman](#).



For more information, see the [Conflict of Interest Policy](#).

You may have a conflict if you:

- Take on outside employment or advisory work
- Become a member of an outside board of directors or advisory board
- Work with family or otherwise have an intimate relationship at work
- Hold financial interests in companies or businesses that are competitors of, or suppliers to, Gartner
- Take for yourself any business opportunities meant for Gartner, or steer that business to family or other entities in which you have an interest
- Engage in political activity or lobbying on behalf of Gartner

Protect our independence

Identify and address conflicts

When a questionable situation arises, take a step back and use the following tool to help you determine the best course of action.

Gartner Ethical Decision Tool

When you face an ethical dilemma, ask yourself:

Does the action I'm considering feel right?

Is it in line with our code of conduct, our values and our policies?

Does it serve the interests of our clients, co-workers, company and community?

Am I willing to be held accountable for this action?

Would I feel comfortable if this were made public?



How do you respond?



Yes

If you answered "yes" to all of these questions, then the decision to move forward is probably okay.

Not sure

Ask your manager or another internal resource for guidance.

No

Stop. Don't do it. The action could have serious consequences. Seek help.

Keep it safe and professional

Promote a safe, productive environment

Our commitment to associates

We're committed to integrating occupational health and safety management into all aspects of our facilities, including design, production, distribution, installation, and support of our products and systems. We always aim to maintain or improve health and safety performance through risk management principles and by implementing new practices and technologies.

We're committed to a violence-free work environment that fosters collaboration, productivity and trust. This is a collective effort.

Be aware of your surroundings at all times (even when representing Gartner off-site) and watch out for any unsafe activity.

Always identify and report threatening behavior or conduct that may endanger people or property.

Do not bring a weapon to work. If you see a weapon at work, report it immediately to security.

Your safety is our top priority. To that end, we:

Invest time and resources to minimize safety risks

Strive for a healthy workplace, which includes fostering work-life balance

Resolve conflicts with co-workers respectfully, never with anger or violence

Do not tolerate drugs or alcohol when working and have zero tolerance for the use, sale or purchase of any illegal substance at any work-sponsored event

Do not tolerate any level of violence, threat of violence or weapons in the workplace



Keep it safe and professional

Communicate clearly and professionally

Express yourself responsibly at all times

Gartner encourages you to share your thoughts and ideas both within and outside the office. But remember, with this privilege comes great responsibility. In all communications, on any platform where you associate yourself with Gartner, you are responsible for following not only this Code of Conduct, but all related policies and guidelines.

Similarly, when you align yourself with Gartner publicly (for example, at a Gartner event, even after hours), do so in your “professional persona.” That means approaching all subjects in a thoughtful, professional manner.

In a nutshell, communicate clearly, accurately, honestly and professionally in all settings.

Key Take-Away:

Who interacts with whom?

Gartner Experts

May represent our thought leadership to journalists and clients

Investor Relations

Handles questions regarding Gartner’s financial performance

Gartner Executives

Field any queries related to our strategy and operations

Public Relations

Media inquiries seeking insight handed off to relevant Gartner experts as appropriate

For further guidance, take a look at our [Public Relations Policy](#).

Keep it safe and professional

Communicate clearly and professionally

Social media

Social media is part of the fabric of all of our lives. It gives us all opportunities to build our personal brands and the Gartner brand. But we should be keenly aware that every action we take in social media can be visible to the public eye, so we must choose our words carefully, make sure our point of view is sound, understand that our comments may be read out of context, and never say anything that would portray ourselves or Gartner in a negative light.

Think before you speak or act when you have associated yourself with Gartner on any communication platform — even if it's a tweet or a Facebook post when you are on holiday.

Read and incorporate the [Social Media Policy](#) into all social interactions, every day.



Keep it safe and professional

Live a culture of mutual respect

Discrimination and harassment: Zero tolerance, no exceptions

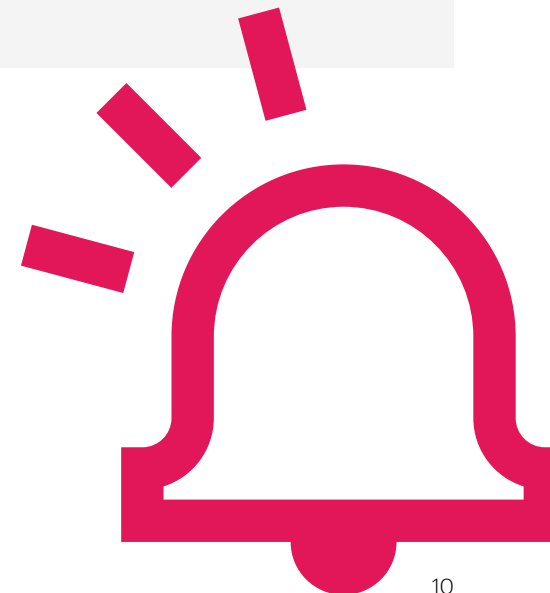
Gartner strives to maintain a productive workplace based on decency, dignity and mutual respect. This is why we prohibit discrimination and harassment — as well as behavior that creates a hostile, offensive or threatening work environment — based on race, color, creed, religion, sex, sexual orientation, gender identity, marital status, citizenship status, age, national origin, ancestry, disability, veteran status, pregnancy or any other legally protected status.

This prohibition applies to all associates across all business units located around the world. There are no exceptions.

Report violations promptly

If you see or suspect behavior that may violate this Code, our policies or the law, please report it as promptly as possible to your manager (any manager receiving such a report must contact HR immediately) or HR partner or by contacting the [Gartner hotline](#) — you will find a link to toll-free numbers in 38 countries and a way to report online.

Gartner does not tolerate retaliation against those who report such behavior or participate in a workplace investigation so long as they do so in good faith. However, it is a violation of this Code and Gartner policy to make false accusations, lie to investigators or otherwise interfere with any Gartner investigation into these issues.



Keep it safe and professional

Live a culture of mutual respect

Fair compensation

Gartner adheres to a pay-for-performance compensation model, meaning men and women in equivalent roles delivering similar performance are paid equally.

Gartner is also committed to following all applicable wage and hour laws in the countries in which we operate, meaning associates are expected to record and report their time accurately when required by law to do so.

Learn more about our policies, procedures and guidelines:

[Equal Employment Opportunity Policy](#)

[Discrimination and Harassment Free Workplace Policy](#)

[Reasonable Accommodations Policy](#)

[Safe and Healthy Workplace Policy](#)

[Guidelines Regarding Gender Transition](#)

Did You Know

- Although different states and countries have different laws on discrimination and harassment, Gartner policies hold all associates accountable to the same standards of behavior.
- When you make a report in good faith, all that is required is that you believe the information you are reporting is correct.



Honor our community

Privacy matters

Protect personal data

Gartner's business depends on our ability to collect, use and handle many types of data, including personal data about individuals at client organizations.

Clients, associates and other third parties share confidential and/or personal data with Gartner because they trust us to use, handle and protect that data properly. If we lose that trust, our reputation and our business could be at risk.

Key Take-Aways:

When dealing with personal data (or any confidential information, for that matter), always ask yourself these questions:

- 1.** Should I have access to this data?
- 2.** Am I allowed to use it for this purpose?
- 3.** Do I have consent to contact this person or disclose his or her data?

When you're unsure, ask your manager or contact the [Data Privacy Team](#) to check whether data use is appropriate.



Honor our community

Privacy matters

Earning and maintaining clients' trust

Our data security and privacy (together, "data protection") efforts include:

We respect individuals' choices about the collection/use of their personal data.


We only use confidential data for appropriate business purposes.

We implement appropriate administrative, technical and physical security controls.

We comply with applicable data protection laws.

We protect data by following the [Gartner Privacy Policy](#).

We report all suspected data breaches or improper data use by contacting the [Data Privacy team](#).

 To learn more, please visit the [Privacy Center](#).



Honor our community

Keep accurate records

Protect our business and reputation

Our customers, suppliers and investors depend on us to provide a clear picture of where we are and where we're headed. As a publicly traded company, we need complete, accurate and accessible information to make intelligent business decisions, and to meet our financial reporting and other regulatory obligations.

Our company's success depends upon our reputation ... a reputation built, in part, through the transparency and reliability of our financial reports.

Learn more

For more information on Gartner accounting policies, visit the [Accounting](#) section of Finance Forms and Policies

For more information on Gartner Global Delegation of Authority, visit the [DOA](#).

For more information on Gartner record retention requirements, visit [Records Retention \(in the Global section\)](#).



Honor our community

Keep accurate records

What you can do:

- Keep clear and accurate records. At Gartner, every transaction, contract, expense report, budget, financial report or any other record created needs to be truthful and complete.
- In all our third-party (supplier/vendor) relationships, follow Gartner [procurement](#) requirements. When entering into a commitment (buying), all applicable [procurement procedures](#) must be followed to ensure our records are complete and accurate.
- In all client contracting (selling), use of Gartner approved templates must be used; any deviations must be approved by Legal. For Research & Advisory, contracts must be submitted through Deal Hub and, where applicable, must include Pricing approval. For Consulting and Conferences, contracts must be submitted to your designated Contracts Negotiator.
- Obtain proper approvals. [Gartner Global Delegation of Authority](#) prescribes the proper levels of approval needed for various types of transactions and contracts.
- Avoid any agreements that violate Gartner contracting policies and procedures. Follow proper contracting procedures in all agreements you make on behalf of our company. This means no side letters (did you know that even an email or a text can be considered a side letter?) or “off the book” agreements that commit Gartner to an obligation outside of company policy.
- Retain and dispose of records in accordance with Gartner’s record retention requirements. Protect information throughout its life cycle, reducing clutter and keeping private and confidential information secure.
- Comply with legal holds. If you are notified that you are subject to a legal hold (request to retain materials related to an investigation or lawsuit), do not alter or destroy any documents until the hold has been lifted.
- Cooperate with audits and investigations. If you are asked to participate in an internal or external audit or investigation, provide any and all requested documents or records as soon as possible. Do not destroy or alter the documents in any way.
- [If you see something, say something](#). False or misleading records and financial reports can have a devastating effect on our business reputation. If you know or suspect Gartner’s recordkeeping or accounting practices are not accurate or sufficient, notify your manager or the [Office of the Ombudsman](#), or contact the [Gartner hotline](#) — you will find a link to toll-free numbers in 38 countries and a way to report online.

Honor our community

Have high expectations of our suppliers

A mutual commitment

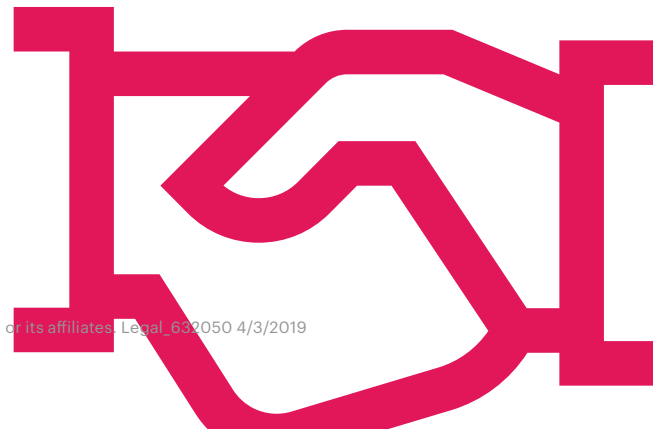
At Gartner, we are committed to transparency, trust, communication and respect.

Our commitment to our clients, associates and shareholders extends to every aspect of our business. We view our suppliers as partners in delivering on our commitments and, just as we hold ourselves to the highest standards of ethics and compliance, we expect the same from each of our suppliers. In fact, we pride ourselves on the strong relationships we build with suppliers and our shared focus on ethics, compliance, fair practices, integrity, safety and quality.

To ensure consistency and mutual commitment, Gartner requires that our suppliers (including their employees, representatives and subcontractors) comply with the [Gartner Supplier Code of Conduct](#).

Our Supplier Code: Basic principles

- Gartner is committed to a work environment that values diversity, respect and integrity.
- Protecting Gartner confidential information and ensuring good practices in privacy and data security is integral to our business and reputation.
- Gartner requires its suppliers to conduct their business as we strive to conduct our business — in a responsible manner, with integrity and high ethical standards, and in compliance with the law.
- Suppliers must comply with the [Supplier Code](#) and the laws. Suppliers are responsible for monitoring or documenting of their compliance and for their efforts to promote compliance within their supply chains.



Act legally and ethically

Respect laws and compete fairly

Uphold our ethics and integrity — everywhere

We are a global brand operating in a multitude of countries around the world. We are cognizant of our footprint and care about our reputation for integrity and ethics everywhere we are, and that begins by following the laws wherever we do business.

Our respect for local laws helps us:

- Build trust with governments
- Strengthen the communities where we live and work
- Give the public confidence in our way of doing things
- Contribute to a fair society where we enjoy the protection of these same laws

Although we compete vigorously, we do so fairly and honestly. We are not deceptive, we don't conceal material facts, abuse privileged or confidential information, or misrepresent who we are. We are truthful in our marketing and promotional activities, we do not mislead anyone, and we do not make false or inaccurate statements about competitors.



Act legally and ethically

Promote fair competition

Foster peer interactions

Facilitating peer interactions is a great value-add for Gartner clients — at conferences, through Gartner Peer Connect and in other forums. In putting our clients together, we need to ensure we adhere to the [Antitrust Policy](#).

Antitrust and anticompetition laws prohibit agreements and business practices that restrain or monopolize trade. We all need to be vigilant when participating in trade industry associations, communicating with clients, suppliers, competitors or former associates, to avoid any perception of limiting or restricting competition.

What you can do

- ✓ Review, share, post and distribute the publicly available [Peer Activities and Antitrust Guidelines](#) with your clients in advance of any peer activities you coordinate.
- ✓ You can also review the [Antitrust Policy](#) for more guidance or contact [Legal Compliance Team](#).



Act legally and ethically

Conduct business appropriately

Avoid even the perception of impropriety

We work with all of our constituencies — each other, clients, those we evaluate in our research, third parties with which we do business, our agents — with high ethics and within the laws of every place we operate.

This can be tricky, because local country laws are not always intuitive and can run counter to even our deep sense of what it means to always “do the right thing.”

For example, even generally acceptable business courtesies may be considered bribes if given to employees of state-owned businesses, and it can take time to assess whether a business is state-owned (it’s not always obvious).

We never offer, promise, make or authorize any payment, bribe or anything of value in conducting Gartner business.

The individuals to consider here are clients, government officials and other third parties. Think of it this way: We don’t ask a third party to perform any activity that we are prohibited from doing ourselves.

Remember, even the appearance of impropriety can damage our reputation. Follow the law, our Code and our policies, and avoid activities that even suggest something improper.



Act legally and ethically

Conduct business appropriately

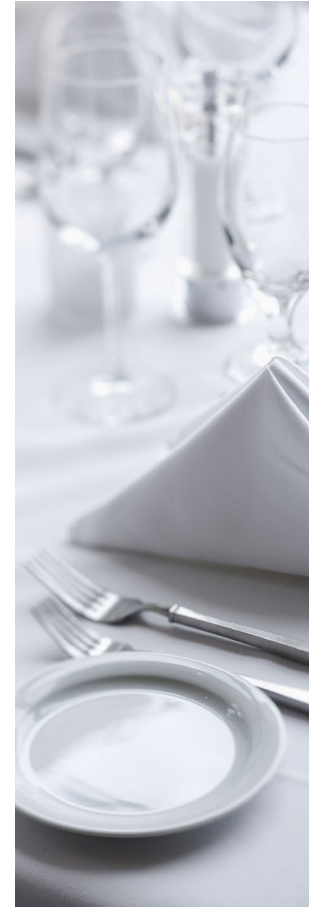
Click on your selection below to reveal the answer.

True or False:

You should treat all our global clients the same when providing business courtesies such as meals or small gifts.

[Click here to see the answer.](#)

- Improper payments can expose both you and Gartner to criminal liability.
- If ever in doubt, refer to the Gartner [Anti-Bribery Policy](#) and report any red flags you encounter in your business dealings by reporting them to the [Office of the Ombudsman](#).



Act legally and ethically

Conduct business appropriately

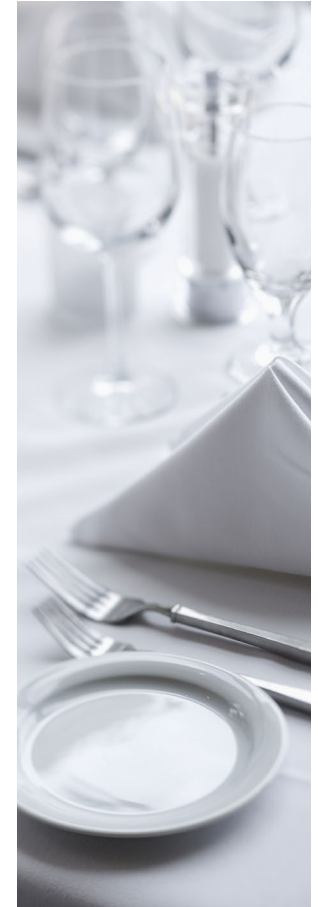
Click on your selection below to reveal the answer.

True or False:

It is OK to give, or authorize another party to give, a payment to a government official to expedite a business need such as a clearance, permit or license, so long as you trust that party or the government official.

[Click here to see the answer.](#)

- Improper payments can expose both you and Gartner to criminal liability.
- If ever in doubt, refer to the Gartner [Anti-Bribery Policy](#) and report any red flags you encounter in your business dealings by reporting them to the [Office of the Ombudsman](#).



Act legally and ethically

Conduct business appropriately

Q.

You're an account executive who's been discussing an ExP renewal with a seatholder, the CIO of a company that is partially state-owned. The CIO has asked if you would be willing to hire his daughter as an intern for the summer in one of our offices around the world. He implied that offering her the position might help Gartner not only secure the renewal but perhaps earn a bigger deal with this client's foreign subsidiaries — and possibly ensure a Winner's Circle finish for you. Would it be okay for you to make sure she gets a position or recommend her to another department for a position?

[Click here to see the answer.](#)

A.



Act legally and ethically

Know your clients

We don't do business with everyone

Know your clients and your suppliers. Having a better understanding of the individuals and entities with which you do business will not only help build better business relationships and further your prospects, it will help ensure that you don't facilitate crimes like money laundering or violate export or sanctions laws, among others.

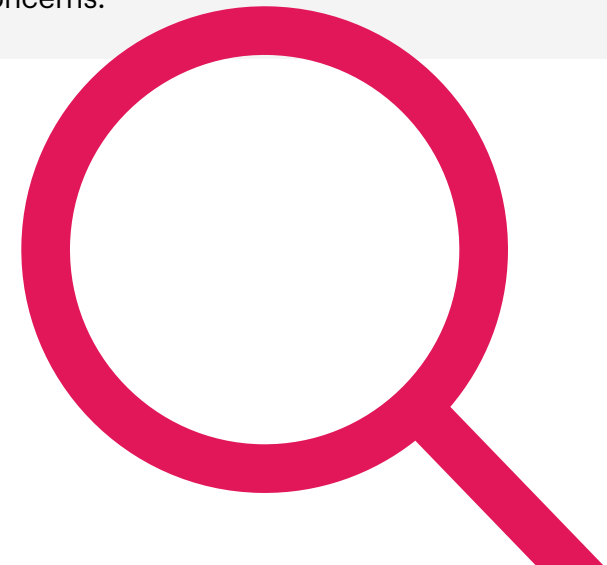
About money laundering

Money laundering can be difficult to detect, but it would have a devastating effect on our reputation. Put simply, money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin (examples include facilitating the trafficking of humans and narcotics, and the financing of terrorism).

Warning signs of potential money laundering

- Attempt to make payments in cash or from an unusual financing source
- Arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or client
- Unusually complex deals that don't reflect a real business purpose
- Attempt to evade tax or record-keeping and reporting requirements
- Deals with suppliers that have not been properly vetted

Reach out to the [Legal Compliance Team](#) with any questions or concerns.



Act legally and ethically

Know your clients

Think globally

Gartner is an intellectual property business — we don't ship any physical products — and as such you might not think that we are subject to export laws or global sanctions.

In fact, we do need to be mindful of these regulations because we operate globally. Knowing who to deal with and what information to share or ship between geographic boundaries comes with being a global company.

Things to keep in mind

- Export controls — especially those that relate to information and technical data that we may transmit from country to country
- Economic sanctions that keep us from doing business with certain countries, governments, entities or individuals from those countries
- Illegal boycotts and the sometimes-veiled requests to participate in them

Reach out to the [Legal Compliance Team](#) for assistance, especially when dealing in new markets or with prospective government officials and agencies.



Act legally and ethically

Protect and value confidential information and intellectual property

Protect client-confidential information

Clients entrust us with their confidential information because we use it to help them make better decisions every day. With this information comes tremendous responsibility for us to protect this content against even inadvertent disclosure outside Gartner, and to use it only for the purpose of helping our clients.

Inappropriate sharing of this information would jeopardize the very foundation of our business. Even when discussing this information internally, we share it only with those who have a need to know, and only in the pursuit of helping clients.

Protect Gartner-confidential information

We also passionately protect Gartner-confidential information such as research methodologies, research work in progress, client lists, unpublished financial data, product and strategy roadmaps, know-how, trade secrets and employee information.

Never agree that a client or third party can own Gartner intellectual property. When in doubt, contact the [Office of the Ombudsman](#). When you leave Gartner, you may not take any materials that contain confidential information with you, nor may you share any of this information with your new employer.



Act legally and ethically

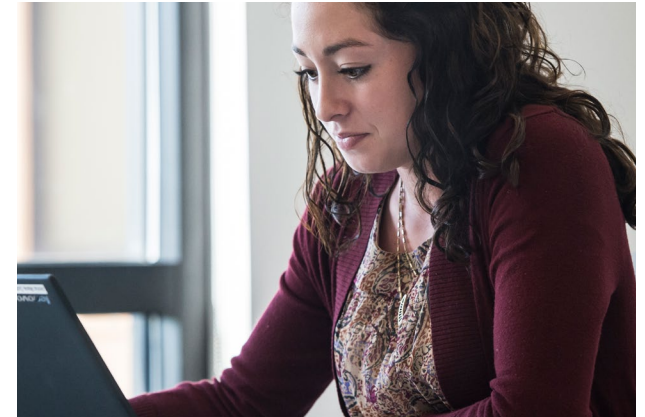
Protect and value confidential information and intellectual property

Q.

You are a Global Technology Sales account executive and want to share a small handful of end-user client names with your prospect to demonstrate how many big clients we have. Can you do it?

[Click here to see the answer.](#)

A.



Act legally and ethically

Protect and value confidential information and intellectual property

Respect others' intellectual property rights

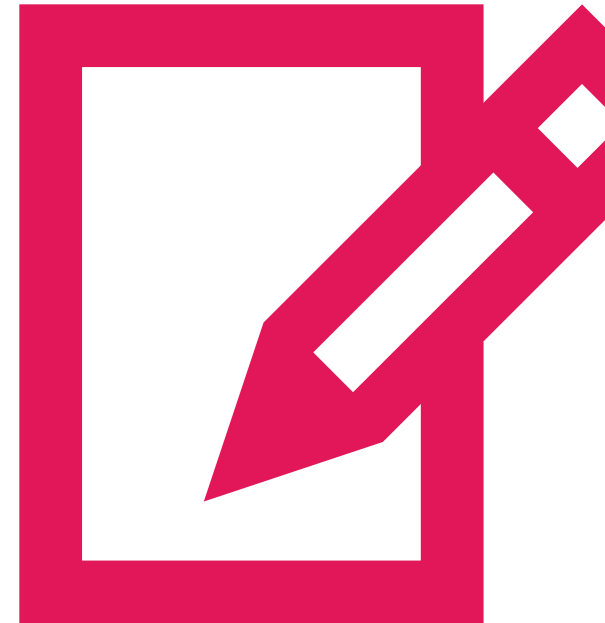
Want to use intellectual property that Gartner does not own (such as photographs, prerecorded music, cartoons and video clips)? This content is generally protected by law and may only be used with permission from the owner.

For example, if you think a photo of that rock star will really help make your point in a conference presentation, you need permission from the owner of the photo before you can present it. Do not fall prey to the common misconception that materials you find on the internet are free to use.

When in doubt, contact the [Office of the Ombudsman](#).

Key Take-Away:

When discussing either client-confidential or Gartner-confidential information, be hyperaware of your environment, especially when you are in public or open places, online or when participating on the web (for example, via social media posts).



Act legally and ethically

Insider trading

Key rules

We treat our investors with fairness and transparency, maintaining a high standard of integrity at all times. Using inside information to gain an unfair advantage over our investors would not only breach the trust they place in us, but also would violate important insider trading laws.

Key rules to remember are:

You may not trade securities (such as stocks, bonds, options) based on material, nonpublic information about Gartner or any other publicly traded company (including information about our clients or companies that we cover). This would constitute illegal insider trading.

You also may not disclose material, nonpublic information to other people so that they can improperly trade those securities. This would be considered stock tipping, and it is also illegal.

What does “insider information” look like?

Information is “material” if a reasonable investor would consider it important in deciding whether to buy, sell or hold a company’s securities. Some examples include:

Financial results and projections

Lawsuits

Mergers, acquisitions or divestitures

New securities offerings

Major changes in senior management

Significant new product announcements

Cybersecurity risks and incidents, including vulnerabilities and breaches

Insider trading and stock tipping can result in substantial civil and criminal penalties, which could mean fines or even jail. For more information, see the [Insider Trading](#) and [Regulation Fair Disclosure policies](#).

Act legally and ethically

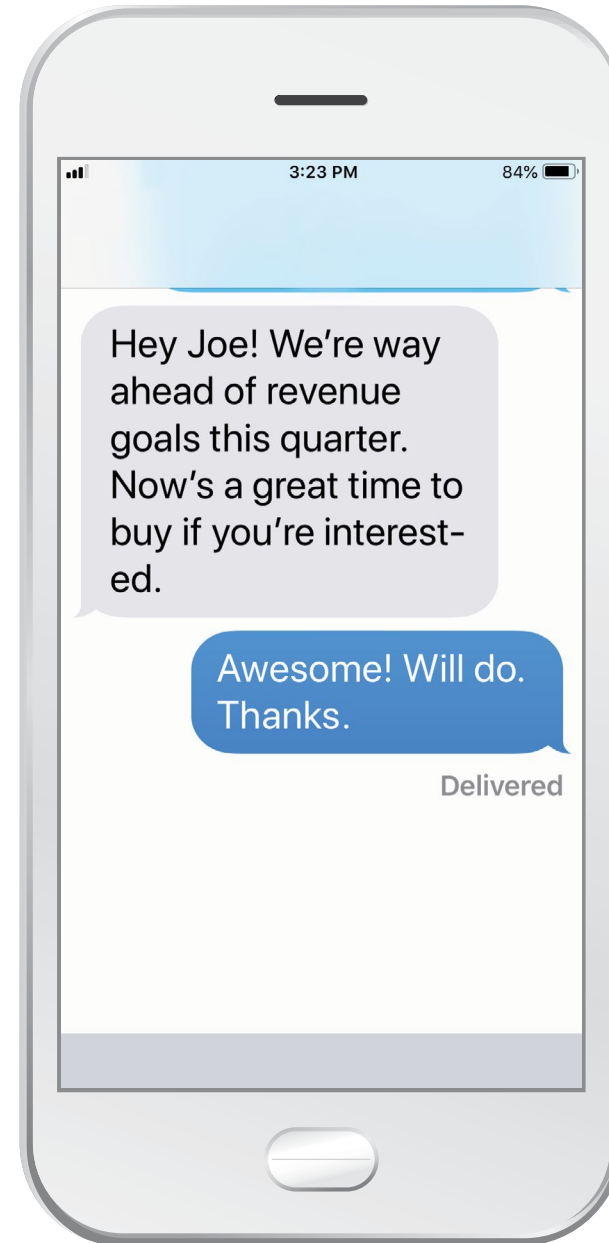
Insider trading

Q.

Did Amy, a Gartner associate, or her brother-in-law violate any insider trading laws or policies?

[Click here to see the answer.](#)

A.



Act legally and ethically

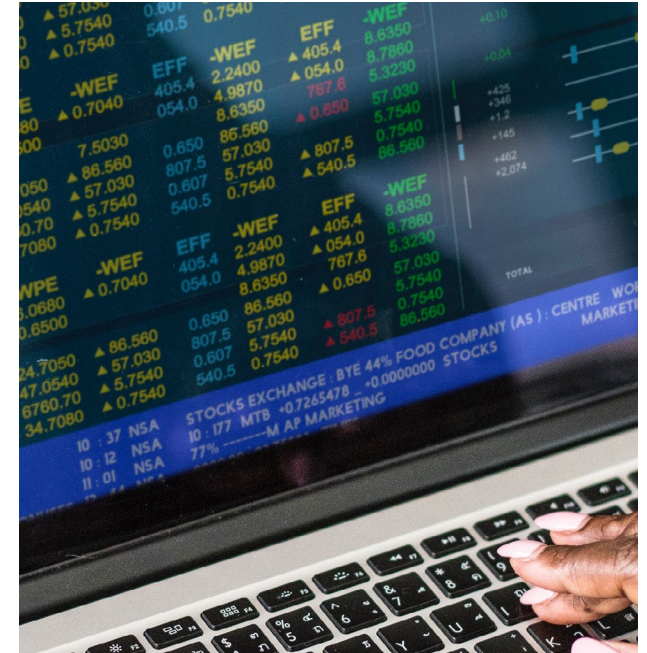
Insider trading

Q.

You are an account executive, and your end-user client considers you her trusted advisor, filling you in on her company's mission-critical priorities and how they change over time. Recently, she let you know that her company is negotiating a deal with a new vendor, and the incumbent, which will lose a multimillion-dollar piece of business, doesn't yet know. She asks from which analysts she can get advice. You give her an analyst's name, and you also quietly sell your stock in that incumbent vendor. Did you do anything wrong?

[Click here to see the answer.](#)

A.



Demonstrate integrity

Character is defined when no one is watching

It would be impossible to create a rule for every situation that might arise, so we must use our best professional judgment to ensure we're complying with applicable laws, our Code and other Gartner policies, at all times. **The Gartner Ethical Decision Tool** is a good starting point (see page 6).

We understand there may be times when you lack immediate access to an informed authority or local law, and your local customs conflict with our Code and policies. When this happens, seek guidance from your manager, your HR partner or the [Office of the Ombudsman](#).

Act with integrity, regardless of whether the Code or Gartner policies specifically address the situation in which you find yourself. And of course, we expect the same from our suppliers and anyone else with whom we conduct business.



Demonstrate integrity

A message from Jules Kaufman, EVP, General Counsel and Corporate Secretary



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Referenced Policies

Accounting and Finance Policies

Anti-Bribery Policy

Antitrust Policy

Conflict of Interest Policy

Contracting and Purchasing Requirements

Discrimination and Harassment Free Workplace Policy

Drug, Alcohol and Tobacco Policy

Equal Employment Opportunity

Gartner Privacy Policy

Global Delegation of Authority

Guidelines Regarding Gender Transition

Insider Trading Policy

Peer Activities and Antitrust Guidelines

Procurement Procedures

Prohibiting Workplace Violence

Public Relations Policy

Reasonable Accommodations Policy

Record Retention requirements

Regulation Fair Disclosure policies

Report an Incident (“If you see something, say something”)

Safe and Healthy Workplace Policy

Social Media Policy

Supplier Code of Conduct