

# 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 [Ombuds](#).

#### 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 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 [Ombuds](#) 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

## Avoid conflicts of interest

### 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 [Ombuds](#).



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

### You may have a conflict if you:

- Take on outside employment or advisory work or act as a pseudo-employee of a client in a staff augmentation role, such as virtual CIO or CISO.
- 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.

You DO have a conflict if you engage in political activity or political lobbying on behalf of Gartner.

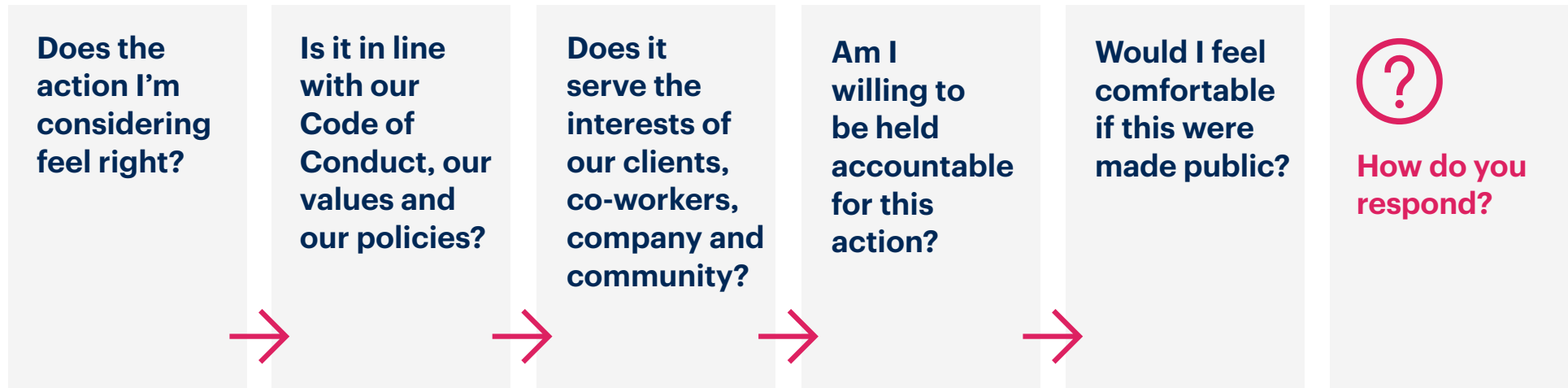
# Protect our independence

## Commit to the highest ethical standard

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:



**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 the [Gartner Global Corporate Security](#) team.

### 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 the use, sale or purchase of any illegal substance while participating in business-related activities — there is zero tolerance for the abuse of any legal substances or alcohol during permissible work functions. [See the Drug, Alcohol and Tobacco Policy](#) for more information

**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

Handles all media inquiries handing off 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. What you say not only reflects on you, but also on Gartner. Anything you write — even if you delete it — could later be used as evidence to challenge you and Gartner in a legal and reputational way.

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](#), where you will find a link to toll-free numbers and a way to report online.

### Retaliation is not tolerated for good-faith concerns

Gartner does not tolerate retaliation from supervisors or other associates against those who report such behavior or participate in a workplace investigation, so long as they do so in good faith. Any associate that engages in retaliatory behavior against someone who has spoken up or participated in the investigation of a complaint in good faith, even if an investigation finds that the complaint was unfounded or not corroborated, will be subject to disciplinary action, up to and including termination. 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 associates 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 or disclose this individual's 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](#).

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 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.

You are obligated to understand the limits of your role and are required to adhere to the [global Gartner Authority Matrix policy](#).

### Learn more

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

For more information on the global Gartner Authority Matrix policy, [please click here](#).

For more information on Gartner record retention requirements, visit [Records Retention](#).



# 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. For instructions on proper expensing, please visit the [Global Travel Corporate Card and Expense Resource Center](#).
- Associates must follow the [Procurement Policy](#) when establishing new relationships with suppliers and when engaging in ongoing activities with existing suppliers.
- All client (sales) contracts must use Gartner-approved templates; any deviations require Legal approval. Submit Research & Advisory contracts through Deal Hub and, where applicable, include Pricing approval. Submit Consulting and Conferences contracts to your designated Contracts Negotiator.
- Obtain proper approvals. The [Gartner Authority Matrix policy](#) prescribes the proper levels of approval needed for various types of transactions and contracts. Areas covered in the GAM include the type of expenditure, who can sign commitments by title and the amount an associate is authorized to approve.
- 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 or explicit client entitlements. Whatever you say, and however you say it, can be binding to you and Gartner.
- 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 and reputation. If you know or suspect Gartner’s recordkeeping or accounting practices are not accurate or sufficient, notify your manager or the [Ombuds](#), or contact the [Gartner Hotline](#) — you will find a link to toll-free numbers 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 — and they — 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 may also review the [Antitrust Policy](#) for more guidance or contact the [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.

Tips to ensure you always work in alignment with the [Gift Policy](#):

- Gifts to other Gartner associates are a personal expense and are not eligible for reimbursement. This includes group gifts (e.g., wedding gift). These must be purchased at associate expense, and contribution must be voluntary.
- It is illegal in many countries to give any gift to a government official. Even where it is legal, it should be very rare and requires written preapproval from a manager or someone higher in your business unit.
- You must have written preapproval from your manager, prior to purchase, for any gift to a third party that you plan to expense.
- You may not give or receive cash or cash equivalents as gifts to or from third parties (e.g., gift cards, loans, stocks or other securities).
- The threshold for both giving and receiving gifts is US\$150 per individual per calendar year. This amount may be lower in your country or business unit (see the [Gift Policy](#) for full details).
- For rules on meals and entertainment, see the [Global Travel Policy](#).

# Act legally and ethically

## Conduct business appropriately

### True or False:

We should consider all clients around the world equally 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](#), [Gift Policy](#) and [Global Travel Policy](#). Report any red flags you encounter in your business dealings to the [Ombuds](#).



# Act legally and ethically

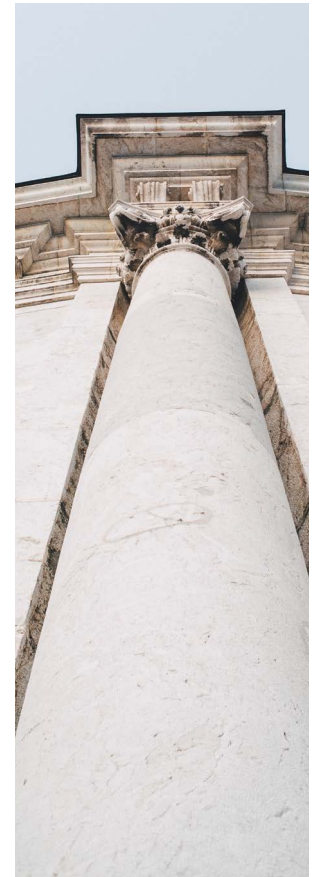
Conduct business appropriately

## 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](#), [Gift Policy](#) and [Global Travel Policy](#). Report any red flags you encounter in your business dealings to the [Ombuds](#).



# 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 their child as an intern for the summer in one of our offices around the world. The seatholder implied that offering the child 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 the child gets a position or recommendation to another department?

[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. See the [Anti-Money Laundering Policy](#) and [Trade Sanctions Policy](#) to learn more.

### 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

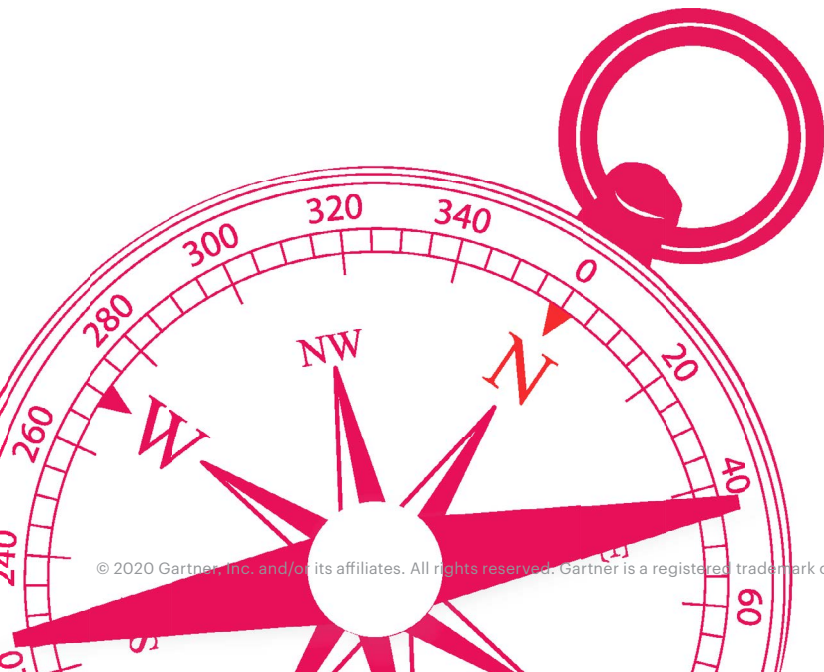
Gartner is an intellectual property business — we don't ship any physical products — and as such you might not think that we are subject to export laws or global sanctions.

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.

### Be aware of these global rules

- 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
- 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, entities that do business with Gartner (including clients and suppliers — supplier price lists are also confidential), 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 [Ombuds](#). 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

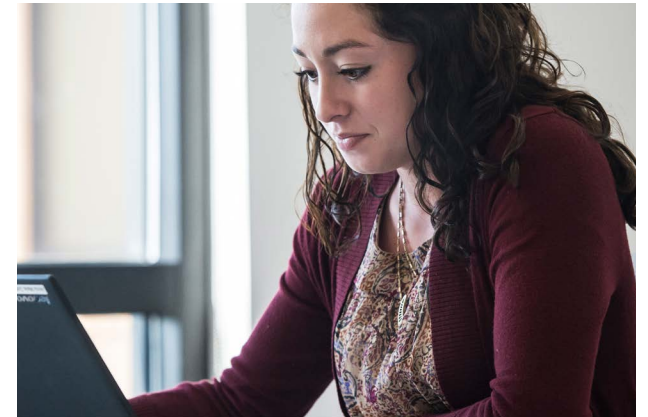
## Protect and value confidential information and intellectual property

**Q.**

You are a Global Business Sales account executive and want to impress your prospect by sharing a few names of clients in the prospect's same industry. Is this allowed?

[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 may 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 [Ombuds](#).

### 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, companies whose stock may be affected by our actions, or those that are our competitors). 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

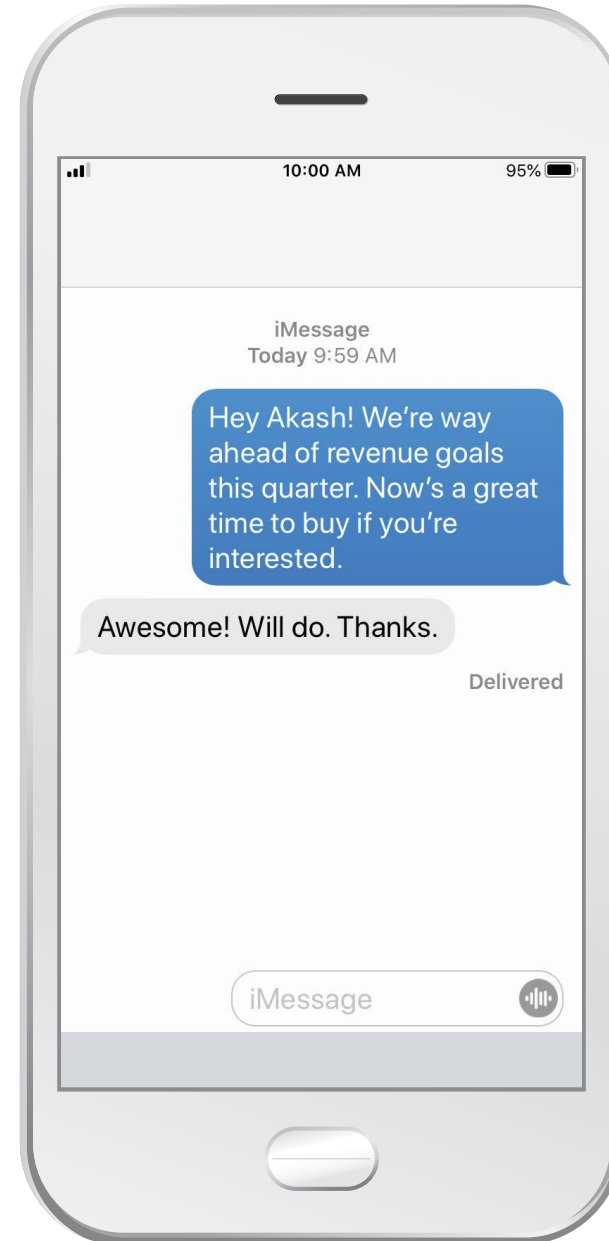
## Insider trading

**Q.**

Did Gartner associate Vidya or her friend Akash violate any insider trading laws or policies in this message exchange?

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

**A.**



# Act legally and ethically

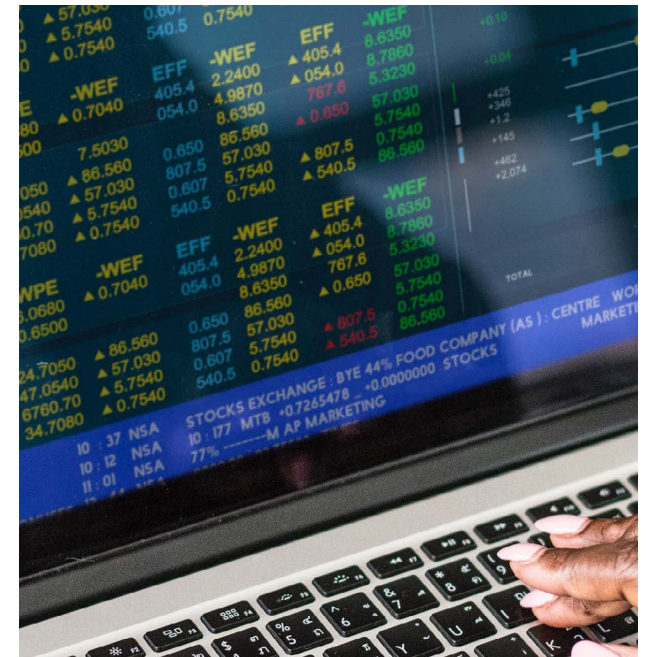
## Insider trading

**Q.**

You are an account executive, and your end-user seatholder considers you a trusted advisor, filling you in on the company's mission-critical priorities and how they change over time. Recently, your seatholder let you know that the 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. The seatholder asks for a list of analysts who can provide advice. You give 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.**



# Live with 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 — even when your actions are not visible to anyone else. **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 [Ombuds](#).

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.



Guard our reputation

Uphold our standards

Protect our independence

Keep it safe and professional

Honor our community

Act legally and ethically

Live with integrity

Referenced policies

# Live with integrity

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





# Referenced policies

[Accounting and Finance Policies](#)

[Anti-Money Laundering 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 Authority Matrix Policy](#)

[Gartner Privacy Policy](#)

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