

Conflict of Interest Policy — External

Business & Personal Conduct

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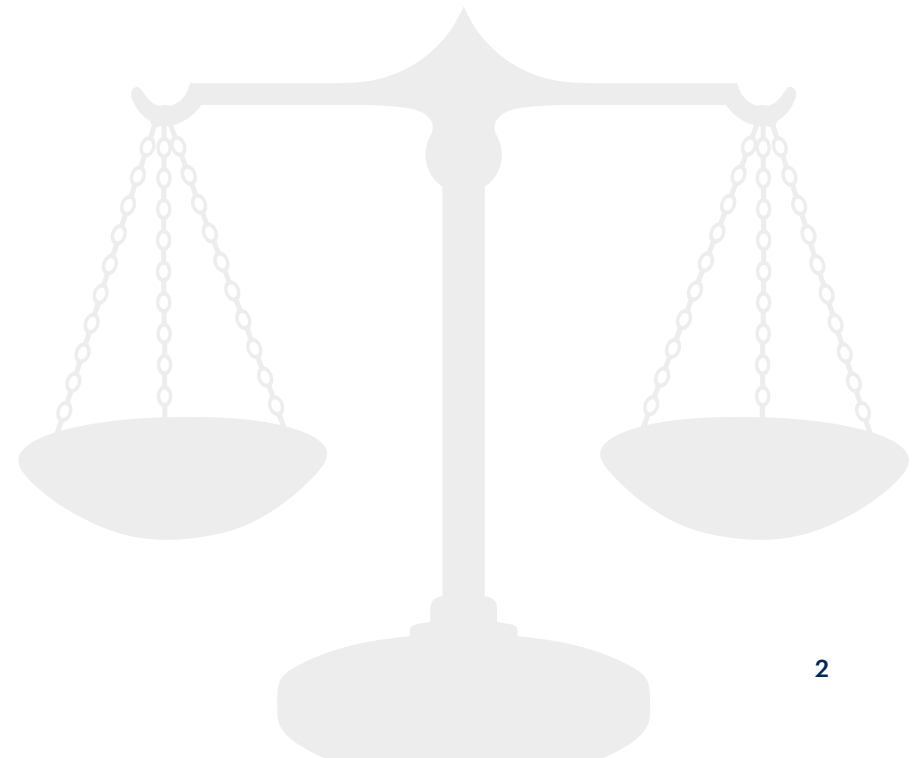
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Policy Philosophy & Purpose

Gartner's reputation for independence and objectivity is one of the company's most important business assets, and one that we are all expected to preserve and protect. As a Gartner associate,¹ you are expected to consider the rights, interests and responsibilities of Gartner and those outside the company with whom we do business, and to avoid situations in which your own interests actually conflict, or may be seen as conflicting, with those of the company.

A conflict of interest exists if you engage in any personal or business-related activity, including a financial interest, that (i) could potentially interfere with your responsibilities or judgment on behalf of the company or its clients, or (ii) conflicts, or appears to conflict in any way, with the interests, or damages the reputation, of the company.



¹An "associate" means any director, officer or other employee of Gartner or its subsidiaries.

Scope & Applicability

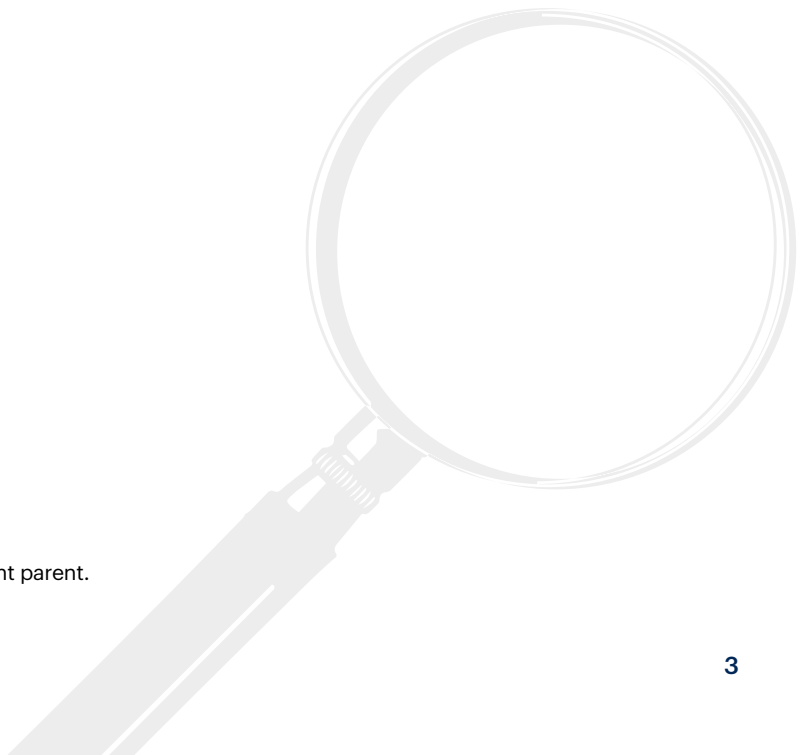
This policy (the “Policy”) applies to Gartner associates, regardless of employment status.

Identifying Potential Conflicts — Your Responsibility

Performance of your daily responsibilities may expose you to potential conflicts of interest. Using sound judgment, you should be able to avoid obvious conflicts. For example, use of your knowledge of Gartner information for personal gain would violate this policy. Situations that present a possible conflict of interest include your personal affiliation with clients, suppliers and competitors or any other entity. This is especially critical if you or a member of your immediate family² has an interest in that client, supplier, competitor or other entity.

Whether or not such a personal affiliation is a conflict of interest will depend on the facts and circumstances in each situation, including the nature of the affiliation, whether the entity is within your area of responsibility, whether your judgment is likely to be affected in any way, and other factors. Therefore, if you have any doubt, first consult with Gartner’s General Counsel or designee, [Ombuds](#) (“Gartner’s General Counsel”).

²“Immediate family” consists of spouse, domestic life partner or equivalent, a dependent child or a dependent parent.



Guidelines



Financial Interests

- A. Suppliers
- B. Competitors



Gartner's Product and Service Choices



Gifts and Entertainment



Outside Activities

- A. Directorships and Other Affiliations
- B. Outside Employment
- C. Public Speaking and Editorializing
- D. Public Office



Political Activities



Reciprocal Dealing



Related Party Transactions



Self-Dealing



Financial Interests

As used in this Policy, “financial interest” means any ownership interest in publicly traded or private companies, or loans from outside organizations (except personal loans, mortgage loans, and similar loans from commercial or savings banks). However, it does not include stocks in existing mutual funds or exchange traded funds (ETFs), or other forms of ownership as may be pre-approved in writing by Gartner’s General Counsel on a case-by-case basis. In considering these situations, the General Counsel may evaluate factors such as the form of ownership (for example, is it held in a blind trust?), whether there is beneficial interest and/or investment control, and other factors pertinent to the Policy.

A. Suppliers

If you are in a position to influence decisions (or can be perceived to influence decisions) with respect to Gartner business with a supplier, neither you nor members of your immediate family may have a financial interest in any entity that does or seeks to do business with Gartner. While associates in Procurement are the people most obviously affected by this rule, it applies to you if you participate in a purchasing decision regardless of your departmental affiliation.

B. Competitors

You may not have a financial interest in, or serve as an officer, director, advisor, partner, consultant, associate or agent, of any entity that competes with Gartner.

Gartner’s Product and Service Choices

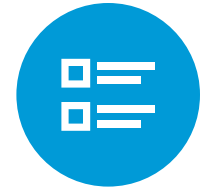
As a company known for evaluating a variety of products and services for our clients, it is important that we not overtly share externally any Gartner product or service decisions or opine on these decisions, or their implementation or use of them. To do so could imply endorsement or disparagement, which Gartner never does for any product or service (see [Gartner Associate External Peer-Networking Guidelines for more details](#)).

Gifts and Entertainment

Giving or receiving gifts, as well as providing or accepting lavish or excessive hospitality to or from Gartner prospects, clients, suppliers, or other providers with whom Gartner conducts business, may violate anti-bribery and anti-corruption laws that exist around the world and may violate Gartner's corporate policies. (See the Anti-Bribery Policy.) Giving and receiving gifts and exchanging other customary business courtesies of nominal value with Gartner clients and providers are only allowed when they comply with [Gartner's Gift Policy](#) and [Global Travel and Expense Policy](#). It is critically important that giving or receiving business courtesies never compromises, or appears to compromise, our independence or our ability to make objective business decisions.

You are prohibited from giving or receiving any gifts, meals, entertainment or other business courtesies that are intended to influence a business decision or could give the appearance of such an intention. You may only give noncash gifts of nominal value to third parties who are not government officials for the purpose of conforming to cultural norms in connection with special occasions, festivities and major holidays in a territory when the giving of gifts is both lawful and expected as a social or cultural courtesy.

Gifts, meals, entertainment, and other business courtesies provided to government officials are subject to stringent legal regulations around the globe. Accordingly, gifts and other business courtesies may NOT be given to any government official unless you receive written pre-approval from your manager or someone higher in your business unit. You may not provide gifts, meals, entertainment or other business courtesies to the immediate family members of government officials.



Outside Activities

A. Directorships and Other Affiliations

To serve as an officer, director, owner, affiliate or formal advisor of any for-profit enterprise you need prior written consent of Gartner's General Counsel in each instance, who will consider the facts and circumstances of your situation and determine whether doing so will conflict with the interests of Gartner. To determine whether a conflict exists, you must fill out the form included in the [Outside Employment, Business Activities or Board Memberships](#).

We encourage associates to participate in lawful nonprofit community, civic and political affairs, so long as they do not conflict with Gartner's interests, impair or interfere with the performance of your job responsibilities, or reflect negatively upon the company's reputation. With one exception, these activities do not require Gartner's General Counsel approval. The exception is non-profit industry associations, where requests must be submitted for review and approval. Such participation is at your own expense and on your own time, and must not involve the use of Gartner's products, influence, facilities, or other resources for the benefit of the nonprofit.

In any such endeavor, make it clear that your participation, particularly as an officer, director, advisor or committee chairperson/member of such nonprofit organization, is in an individual capacity and is not on behalf of the company, and that any views expressed are your own personal views. Be aware that in your position with the nonprofit organization, you may need to abstain from commenting on, or participating in the making of, decisions that could affect Gartner, such as a decision by the organization to obtain the type of services offered by Gartner.



B. Outside Employment

All full-time associates must receive written approval for outside employment from Gartner's General Counsel. You may not use any Gartner resources including, without limitation, computers, telephones, facsimile machines, and photocopy machines, in any such outside employment. See policy on [Outside Employment, Business Activities or Board Memberships](#) for further details.

C. Public Speaking and Editorializing

Unless you are acting in the scope of your professional persona, you are responsible for making it clear that any views you express in a public forum on matters of public interest are your personal views and do not represent the views of Gartner or its management. You will be considered to be acting in your professional persona when you: (i) identify yourself in any social environment as a Gartner associate; (ii) occupy a role at Gartner responsible for creating our intellectual capital, such as an expert in Research & Advisory, consultant, executive partner or leadership partner, and are commenting on a topic related to your coverage area; or (iii) are participating in any Gartner-branded social media property.

D. Public Office

Prior to seeking an elective or appointive public office, you must obtain written approval from Gartner's General Counsel to ensure the activity does not conflict with your duties or Gartner business. Gartner will not pay you for any time spent running for public office, serving as an elected official, or campaigning for a political candidate, unless required by law, or you otherwise use approved Paid Time Off. You are responsible for making it clear that your positions are personal ones and are not being made on behalf of Gartner.

Political Activities

Gartner does not participate in any political activities. You are not authorized to make or approve any contributions or expenditures of company funds or use company facilities, equipment or supplies to support or oppose political activity in any jurisdiction.

Reciprocal Dealing

You may not tell an existing or potential supplier that Gartner's decision to purchase its goods or services is conditioned on this entity's agreement to purchase Gartner's goods or services. A Gartner supplier may also be a client of the company, but the decision of both Gartner and the supplier to use each other's goods and services must be made independently.



Related Party Transactions

Unless you receive prior written consent of Gartner’s General Counsel after full disclosure of the circumstances, you may not enter into agreements on behalf of Gartner with any outside entity if you know that the entity is a “related party” to another Gartner associate (that is, the contract would confer a financial benefit, either directly or indirectly, on other Gartner associate/s or their relatives). For example, if you are a Procurement associate, you may not negotiate the purchase of office equipment for Gartner when you are aware of a potential conflict (for example, you know that a Gartner associate’s mother retains ownership in this office equipment provider), unless you have General Counsel permission.

You may not be a supplier to Gartner, represent any Gartner suppliers, work for any Gartner suppliers, or accept money or benefits of any kind from Gartner suppliers, without the prior written consent of Gartner’s General Counsel.

Self-Dealing

You may not provide or commercially market products or services to others that compete with Gartner’s product offerings. Such activities are “commercial” if you receive direct or indirect payment of any kind for such services. You may not cause Gartner to purchase services or products from your family members or businesses in which you or your family have a controlling interest, without disclosure of the relationship and approval from Gartner’s General Counsel prior to agreement.



Procedures and Related Policies

If you have any questions or are aware of any violations of this policy, please notify [Gartner's General Counsel](#).

Violation of this policy will result in appropriate disciplinary action, up to and including termination of employment.

Associated Policies

[Anti-Bribery Policy](#)

[Associate External Peer-Networking Guidelines](#)

[Code of Conduct](#)

[Gift Policy](#)

[Global Travel and Expense Policy](#)

[Outside Employment, Business Activities or Board Memberships](#)