

Gartner®

Code of Conduct



Message from our CEO

Dear Colleagues:

At Gartner, we guide the leaders who shape the world. We deliver actionable, objective insight that drives smarter decisions and stronger performance against a backdrop of rapid, technology-driven change. Our insights, guidance 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.

As we grow, our global impact continues to expand. 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 operate on a global scale — consistently, authentically and truthfully. And it's a behavior-based virtue that we continuously reinforce as we grow.

The Gartner Code of Conduct is our guide for setting expectations about how associates should conduct themselves in the communities we serve — both outside and inside the company. Our leaders across the organization embrace the Code because it protects and advances our brand and sets our people up for the greatest possible success.

Each year, we ask every associate to affirm they have read, understand and comply with the Gartner Code of Conduct. If you have questions, please ask your manager or your HR partner for guidance.

We are steadfast in honoring our no-retaliation policy for those who raise good-faith concerns. If you see inappropriate behavior, questionable business practices, possible misconduct or other situations that you believe violate the Code or any other Gartner policy, please report them through

the channels outlined in this Code. Thank you for your continued commitment to Gartner and our world-class work environment.

Sincerely,



A handwritten signature in black ink that reads "Gene Hall". The signature is written in a cursive, flowing style.

Gene Hall
Chief Executive Officer

Our purpose

We guide the leaders who shape the world.

Our mission

We deliver actionable, objective insight that drives smarter decisions and stronger performance on an organization's mission-critical priorities.

Set daily client engagement goals

- X # Calls per day / Y # w/ unengaged clients (i.e.)
- 80% Client calls contain at least 1 engagement (min)
- 100%



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Our Culture

We have a purposeful culture



We have a purposeful culture



We impact clients' mission-critical priorities



We do the right things and great results follow



We embody a no-limits mindset



We uphold the highest ethical standards



We make objective, fact-based decisions



We prioritize relentlessly



We get better, faster, stronger every year



We win as a team



We embrace diversity, are inclusive and respectful



We are humble and hungry

Our Integrity

Speak up: Your voice matters

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Speak up: 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 are concerned that 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 policy, a process or a situation that "just didn't feel right," it is always better to ask the question.

We do not tolerate retaliation

Gartner does not tolerate retaliation of any kind against anyone who reports a concern in good faith, participates honestly in an investigation or who helps to investigate or resolve the issue brought forward. Any associate who engages in retaliatory behavior will be subject to disciplinary action, up to and including termination of employment. It is a violation of this Code to make false accusations, lie to investigators or interfere with any investigation.

To learn more about speaking up, visit the [Speak Up Resource Center](#).



Speak up

Throughout this Code you will see this speak-up call-out that will direct you to our [reporting channels](#).



Speak-up reporting channels

These are the reporting channels to use to raise an issue or concern, or ask a question. Feel free to choose the channel with which you are most comfortable:



Your manager

You can start by talking to your manager. Managers are often able to answer questions or direct you to the right resource. For some concerns, managers must escalate to the appropriate reporting channel (their management, HR, [Legal & Compliance](#), or [Ombuds](#), depending on the issue).



Someone outside your team

You can always talk to any other manager in your business unit, your (or any other) HR partner, [Legal & Compliance](#), or [Ombuds](#) if the concern relates to Gartner's independence and objectivity.



The Gartner Ethics Helpline

Our third-party helpline allows for local-language, anonymous reporting (if desired and legal in your location), 24 hours a day, 7 days a week. If you don't feel comfortable speaking to the other reporting channels, you can contact the [Gartner Ethics Helpline](#) — you will find a link to toll-free numbers and a way to report online.

Managers: Listen and act

As leaders, we must create a workplace where associates feel comfortable coming forward with questions and concerns, and we must support associates who speak up. We never retaliate against associates for raising concerns in good faith. 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, when you receive a concern that warrants escalation, you must immediately bring it to one of the reporting channels. Do not start investigating yourself. If you have a question, contact your HR partner or [Legal & Compliance](#).

Remember that by speaking up, the associate is doing something difficult and important. Respond respectfully. Thank them for speaking up, even if you disagree. Show that you're focused on resolving the issue. We must maintain confidentiality to the extent possible, so do not discuss the conversation with anyone other than to contact a reporting channel.

Lead by example

If your role involves leading or managing people, we expect you to:

- Talk about the Code and our values. Read the Code and make ethics conversations a regular part of your interactions.
- Reward integrity. Recognize and reward associates for doing the right thing.
- Be accountable for training. Ensure your team completes required training on time, every time.
- Know what you don't know. Know where to go for answers when you or your associates have questions that you can't resolve.



Making ethical decisions

Commit to the highest ethical standards. When a questionable situation arises, 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 OK.

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.

Investigations

Gartner has a defined process for handling concerns to ensure the following outcomes:

- The correct resources are assigned so that all concerns are investigated objectively and resolved appropriately.
- Anyone raising a concern in good faith or participating honestly in an investigation is protected from retaliation.
- Reporters may report anonymously, where permitted by law, without fear of retaliation.

If you have reported anonymously through the Gartner Ethics Helpline, the appropriate associate will contact you by posting a response with the helpline. You may reply to the post while still maintaining anonymity, if you choose.

If you have self-identified and reported through the helpline or reported directly to one of our reporting channels, then the appropriate associate will contact you to obtain additional information.

Gartner will endeavor to keep a reporter's identity confidential to the greatest extent possible while conducting a thorough investigation.

Please know that any person accused of wrongdoing will be treated fairly and objectively.



Speak up

For guidance on how to speak up, visit the [reporting channels](#).

Our Respect for One Another

Discrimination and harassment:

Zero tolerance

Fair compensation and equal employment

Embracing diversity, equity and inclusion

Safety and security

Drugs and alcohol

Protection of human rights



Discrimination and harassment: Zero tolerance

Gartner strives to maintain a workplace based on decency, dignity and mutual respect. We prohibit discrimination, harassment and 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. Speak up and remember that Gartner does not tolerate retaliation for raising a concern in good faith or participating honestly in an investigation.

Read and follow the [Discrimination and Harassment Free Workplace Policy](#) as well as your local policy available in the [Discrimination & Harassment Free Workplace Resource Center](#). If you have additional questions, please contact your [HR partner](#).

Fair compensation and equal employment

Gartner adheres to a pay-for-performance compensation model; our goal is to deliver equal pay for associates in equivalent roles, with similar experience and responsibility, delivering similar levels of performance.

Gartner also remains committed to following applicable wage and hour laws in the countries in which we operate.

Read and follow our policies, procedures and guidelines:

- [Equal Employment Opportunity Policy](#)
- [Reasonable Accommodations Policy](#)
- [Health and Safety Policy](#)
- [Guidelines Regarding Gender Transition](#)

If you have additional questions, please contact your [HR partner](#).

Embracing diversity, equity and inclusion

We are an inclusive organization that values people with diverse backgrounds and experiences.

“Together as One” is our mission to ensure everyone feels included, respected and valued. Embracing these ideals as part of our culture enables us to attract and retain the best talent, and to inspire a high-performance organization that gets better, faster and stronger every year.

To articulate our vision, we created shared definitions of diversity, equity and inclusion:

Diversity — a collective mixture of differences and similarities

Equity — fair treatment and equality of access to opportunity, information and resources for all

Inclusion — the achievement of a work environment where all people feel respected, accepted, supported and valued

As a Gartner associate, you have a role to play in fostering diversity, equity and inclusion:

- Listen with respect, patience and empathy, creating an environment conducive to dialogue.
- Ask questions and remain open to different perspectives.
- Seek to expand your awareness and learn about one another in a safe space.
- Celebrate the unique contributions of others.

Our [employee resource groups \(ERGs\)](#) are voluntary, associate-led and open to all. They support the associate experience by providing opportunities to connect our communities and celebrate our history, heritage and key moments that matter.

“We are a multicultural, global business, serving clients in more than 100 countries around the world. Our teams are composed of individuals from different geographies, cultures, ethnicities, religions, races, genders, sexual orientations, abilities and generations. We are united in our mission, and we work together to solve problems. In doing so, we operate at the highest ethical standards, with respect for all, across our associates, clients and communities.”

Gene Hall, CEO

Safety and security

Gartner is committed to supporting associate safety and security, protecting the integrity of Gartner's brand and safeguarding Gartner assets. We always aim to maintain or improve safety and security through appropriate risk management principles and by implementing best practices and technologies. Safety and security are everyone's responsibility.

At Gartner, we:

- Create a work environment that helps to safeguard associate health and well-being
- Work to provide a safe and secure workplace, with zero tolerance for violence or harassment
- Share information on global risks and how to respond to emergencies

Associate responsibilities

Everyone at Gartner, regardless of location, position or role, must adhere to and promote a culture of safety and security. This includes, but is not limited to, attendance at a Gartner event, using a Gartner office, or traveling on Gartner business.

Read and follow the policies below to keep Gartner safe and secure:

- [Global Safety & Security](#)
- [Physical Security Policy](#)
- [Prohibiting Workplace Violence Policy](#)
- [Weapons and Prohibited Items Policy](#)
- [“What to Do If”: Emergency Response Guide](#)

If you have additional questions, contact [Global Safety & Security](#).



Drugs and alcohol

We do not tolerate the use, sale or purchase of any illegal substances while participating in business-related activities, including those held after hours or off-site. There is zero tolerance for the use of any illegal substances during business events.

- Associates may not be impaired due to use of alcohol or other substances while on Gartner premises or conducting business-related activities off-premises or at any Gartner-sponsored or business-related function.
- While associates of legal age may consume alcohol in moderation at company-sponsored events, do not pressure or encourage others to consume alcohol.
- If you have a concern about an associate's safety or well-being, contact your manager or [HR partner](#).

Read and follow the [Drug, Alcohol and Tobacco Policy](#). If you have additional questions, please contact your [HR partner](#).

Protection of human rights

Gartner is committed to human rights in the workplace. Each associate has a responsibility to uphold this commitment, which includes respecting the dignity and worth of all employees.

Read and follow the [Human Rights Policy](#) and our [Modern Slavery Statement](#).

If you have additional questions, contact [Legal & Compliance](#).



Our Compliance With the Law

Anti-bribery: Conducting business appropriately

Gifts and entertainment: Avoiding even the perception of impropriety

Avoiding financial crime

Antitrust: Promoting fair competition

Fair dealing

Insider trading

Data privacy

Industrial security



Anti-bribery: Conducting business appropriately

Gartner strictly prohibits corruption in all forms, in all our business dealings, in every country where we do business. You must not pay bribes to, or accept bribes from, anyone, anywhere, at any time, for any reason. There are anti-bribery laws that apply to you wherever you are located.

Specifically, Gartner does not offer, promise or give anything of value to anyone, including a government official, to improperly obtain new business, to retain existing business, to secure an improper advantage or to influence any act or decision of a person or entity. Gartner does not make facilitation payments, which are payments made to a government official to speed up routine government actions, for example, processing visas, supplying utilities, delivering mail. For the definition of government officials see the [Anti-Bribery Policy](#).

Gartner uses third parties, such as suppliers and those who act on Gartner's behalf (e.g., contractors and agents), to help Gartner deliver its products and services in the marketplace. You must only deal with legitimate third parties with a reputation for integrity. Gartner can be liable for the actions of its third parties, and we never let a third party do what we cannot do ourselves. Gartner conducts due diligence on our third parties, and we never ignore "red flags" that indicate a third party may be making improper payments or engaging in corrupt behavior on Gartner's behalf (for red flags see the [Anti-Bribery Policy](#)).

Read and follow the [Anti-Bribery Policy](#). If you have additional questions view the [Anti-Financial Crime Resource Center](#) and contact [Ethics & Compliance](#).

Key definitions



Anything of value

Anything of value includes cash or cash equivalents; a job or internship; a reference, referral or endorsement; a loan, favorable contract terms or promises of future business; gifts, meals, entertainment, hospitality or travel; charitable or political contributions; tickets to events or parties; or anything else of value, including anything that is valuable to the recipient, even if it would not be valuable to anyone else.



Red flags

- Commission substantially above going rate
- Vaguely described services or plan for performing the work is vague and/or suggests a reliance on contacts or relationships
- Requests for payment to a numbered account, third party or consultant
- Proposes the use of a shell company
- Requests or demands to use a specific third party
- Lack of qualifications or resources to perform real work
- Incomplete or inaccurate information on required disclosures, e.g., refusal to disclose ownership

Gifts and entertainment: Avoiding even the perception of impropriety

Gifts, meals and entertainment are normal aspects of business so long as they are reasonable, not lavish, not frequent and serve a business purpose as defined in the [Gift Policy](#) and [Global Travel and Expense Policy](#).

- See the policies for monetary thresholds. Local laws may be stricter or more comprehensive, so pay attention to the country-specific rules in each policy.
- Know whether the intended recipient or invitee is a government official before making a purchase or issuing an invitation, as the rules for government officials are stricter than nongovernment officials and can vary from country to country.
- Do not give gifts or host a client, prospect or supplier during contract negotiations or sourcing events. The appearance of impropriety can damage our reputation.
- Do not give or receive cash or cash equivalents as gifts to or from third parties (e.g., gift cards, loans, stocks or other securities).



True or False

It is OK to give, or authorize another party to give, a payment to a government official to win a new deal as long as you know and trust the government official.



False

Be careful when dealing with government officials, including employees of state-owned enterprises. Payments of anything of value to anyone, including government officials, for the improper purpose of obtaining or retaining business, is a bribe. Gartner conducts due diligence on transactions involving government officials, and it is not sufficient that you “know and trust” the individual. For assistance with anti-bribery due diligence, please contact [Ethics & Compliance](#).

Improper payments can expose both you and Gartner to criminal liability.

Act legally and ethically

Conduct business appropriately

Read and follow the [Anti-Bribery Policy](#), [Gift Policy](#) and [Global Travel and Expense Policy](#). Contact [Ethics & Compliance](#) to report any red flags you encounter in your business dealings, or if you have additional questions about anti-bribery or gifts or entertainment.



Speak up

For guidance on how to speak up, visit the [reporting channels](#).



Question

You're an account executive who's been discussing an Executive Programs renewal with a license holder, 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. The license holder implied that offering the child the position might help Gartner secure the renewal. Is it OK for you to ensure the CIO's child gets a position?



Answer

No. Offering the CIO's child a job or internship in exchange for a business advantage could be considered bribery. It would also violate Gartner policies, which make clear that we hire solely on the basis of merit, and candidates interviewing for a position must go through the normal hiring process. Conduct involving bribery is harmful to our reputation. If you learn of an offer similar to this one, please report it using one of the reporting channels.

Avoiding financial crime

Trade sanctions

Trade sanctions are legal, financial restrictions imposed by governments or international bodies to isolate or exclude an individual, entity or country from the global economy due to legal or public policy considerations. Trade sanctions prohibit Gartner from doing business in certain geographies, including Cuba, Iran, North Korea, the Crimea Region and Syria.

Know your clients and your suppliers. Having a better understanding of the individuals and entities with which we do business will not only help build better business relationships and further your prospects, it will also help ensure we do not violate trade sanctions or export control laws. Onboard all third parties using the appropriate Gartner system so that the proper due diligence and sanctions screening is conducted, and do not agree to participate in any boycotts.

Read and follow the [Trade Sanctions Policy](#). If you have additional questions, view the [Anti-Financial Crime Resource Center](#) or contact [Ethics & Compliance](#).

Money laundering

Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin. Money laundering can be difficult to detect; it would have a devastating effect on our reputation.

Best practices

Always look for the following warning signs of potential money laundering:

- Attempts to make payments in cash or from an unusual 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
- Attempts to evade tax or record-keeping and reporting requirements
- Deals with third parties that have not been vetted

Read and follow the [Anti-Money Laundering Policy](#). If you have additional questions, view the [Anti-Financial Crime Resource Center](#) or contact [Ethics & Compliance](#).

Antitrust: Promoting fair competition

Antitrust and competition laws prohibit agreements and business practices that restrain or monopolize trade. We must be vigilant when participating in trade industry associations or communicating with third parties, including clients, suppliers and competitors, to avoid the perception of limiting or restricting competition. We do this by never discussing or facilitating discussions about confidential information, including pricing, strategic business plans, or terms and conditions of sales.

- Do not discuss confidential business information with our competitors.
- Do not facilitate the sharing of confidential business information among our clients or prospects.
- Do not agree to divide markets, customers or territories; do not agree to boycott customers, suppliers or other competitors.
- Never share confidential, nonpublic information, nor do we seek it through deception, theft or unlawful or unethical means.
- Never use your prior employer's confidential or sensitive business information or seek such information from anyone we hire.

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

Read and follow the [Antitrust Policy](#). If you have additional questions, view the [Antitrust Resource Center](#) or contact [Ethics & Compliance](#).

Fair dealing

Doing what is right and acting ethically is at the core of our culture. Our associates, clients, suppliers and other stakeholders know they can trust Gartner to be fair and honest. Each associate should deal fairly with their colleagues and all of Gartner's stakeholders, including our competitors. We do not take unfair advantage through manipulation, concealment, abuse of proprietary or confidential information, misrepresentation of material facts or any intentional unfair dealing or practice.



Insider trading

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

Key rules

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

What does “material, nonpublic 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 tipping can result in substantial civil and criminal penalties, which could mean fines or even jail.

Read and follow the [Insider Trading Policy](#) and [Regulation Fair Disclosure Policy](#). If you have additional questions, contact [Legal & Compliance](#).

Data privacy

Protecting 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 provide their personal data to 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, always ask yourself:

- Should I have access to this data?
- Am I allowed to use it for this purpose?
- Do I have consent to contact this individual or disclose their data?

If the answers are unclear, contact the [Data Protection Team](#).

Earning and maintaining clients' trust

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

- We respect individuals' choices about the collection/use of their personal data.
- We only use personal data for appropriate business purposes.
- We implement appropriate administrative, technical and physical security controls.
- We comply with applicable data protection laws.
- We report all suspected data breaches or improper data use to the [Data Protection Team](#).

Read and follow the [Privacy Policy](#). If you have additional questions, visit the [Privacy & Data Protection Resource Center](#) or contact the [Data Protection Team](#).

Industrial security

Gartner has certain clearances that allow certain Gartner entities and associates access to classified and controlled unclassified information (CUI). We ensure that such information is managed according to relevant laws.

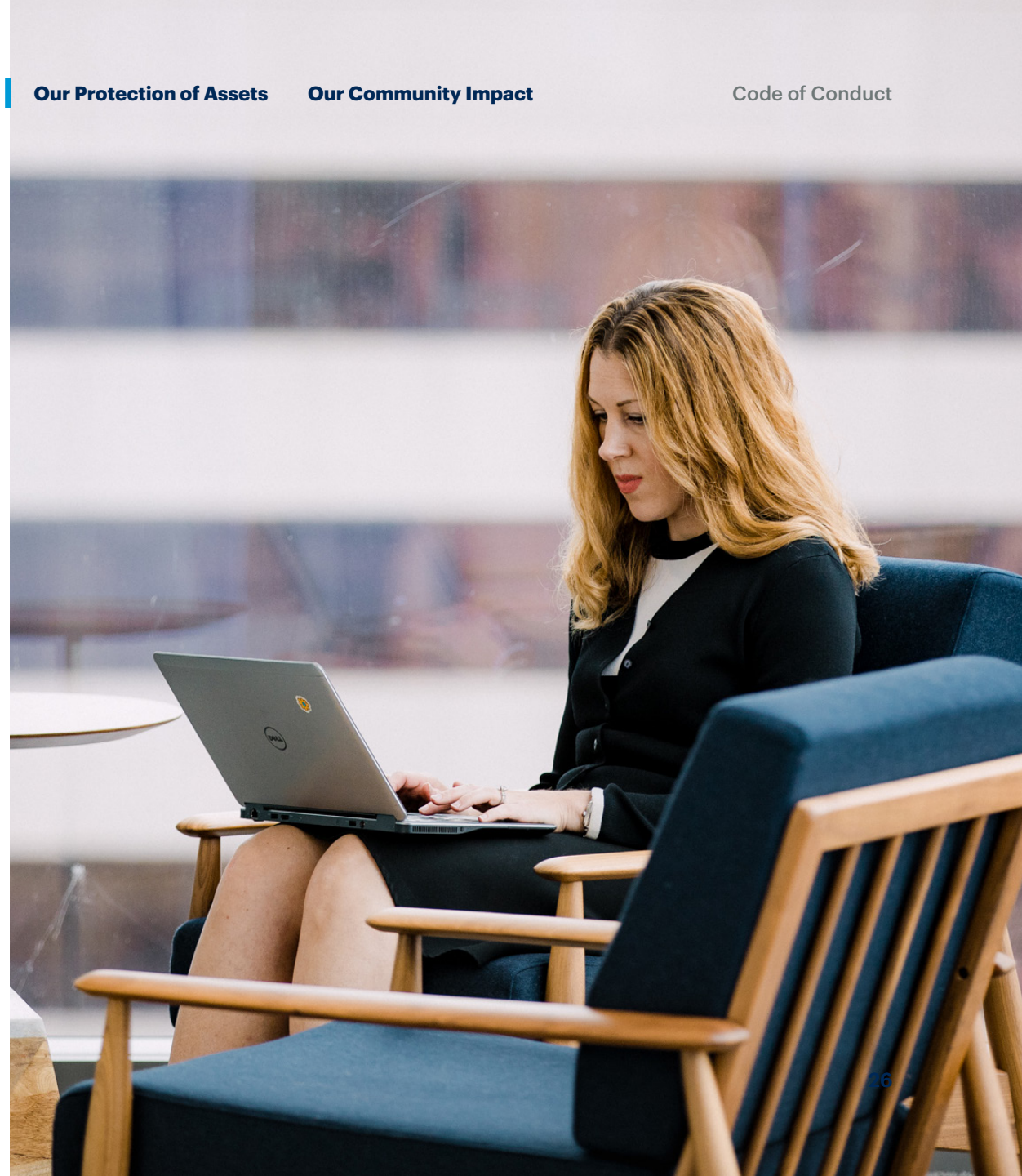
Because we are entrusted with classified information and CUI from our clients, mishandling such information can damage Gartner's reputation, put a strain on client relations and result in penalties, fines and even debarment from doing our work. Classified information can only be accessed pursuant to our agreements.

To avoid these consequences and protect information we:

- Handle, store, disseminate and dispose of classified information and CUI in accordance with applicable requirements and laws
- Comply with and seek to exceed client and national security policy requirements
- Ensure recipients have the proper security clearance and need-to-know prior to disclosing information

Report all unauthorized disclosures of classified information and CUI.

If you have additional questions, visit the [Industrial Security Resource Center](#).



Our Protection of Assets

Conflicts of interest

Financial responsibility and internal controls

Protecting our business and reputation by following our internal controls

Information and cybersecurity

Protecting confidential information

Protecting Gartner content

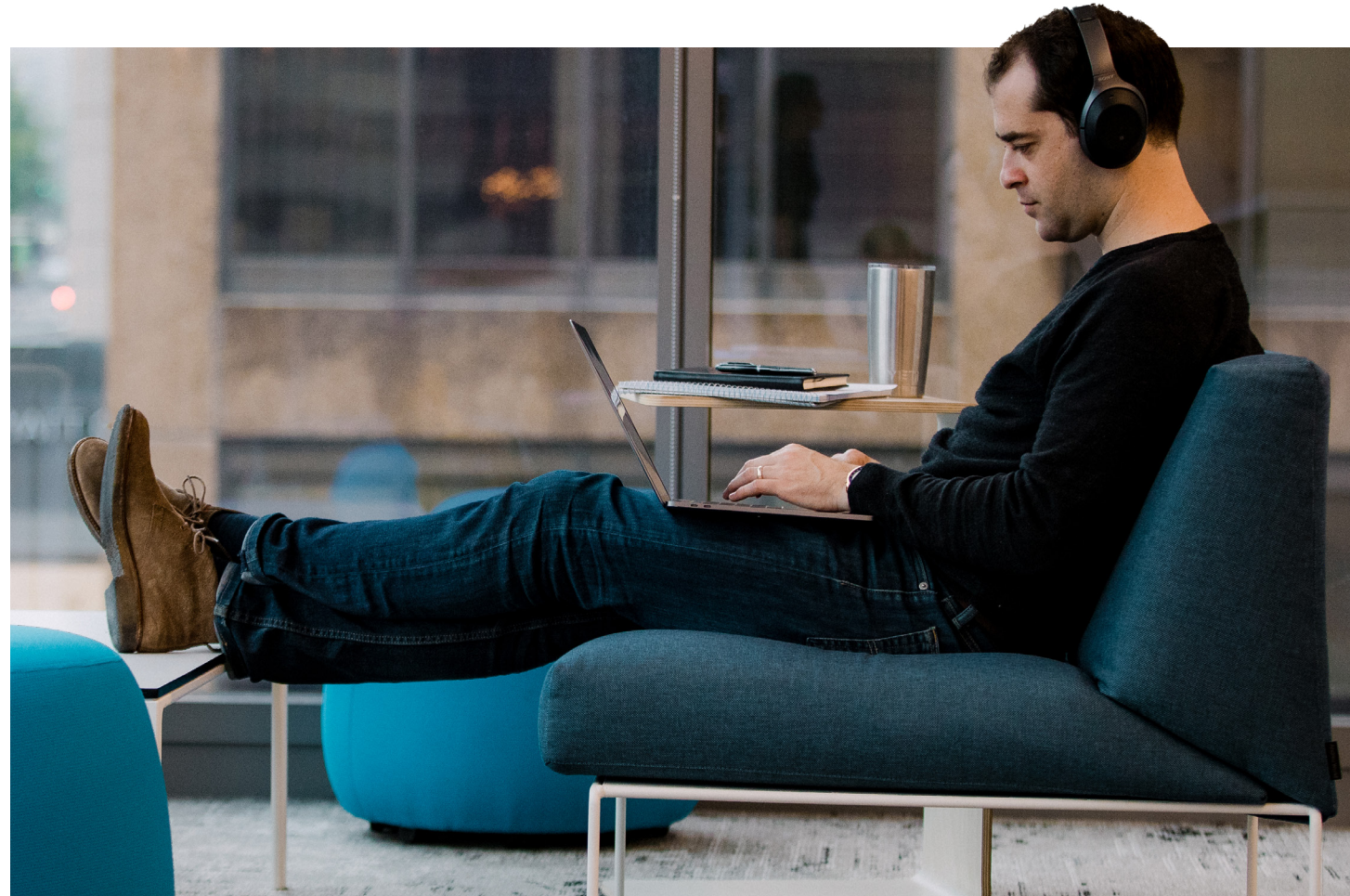
Respecting IP rights

Communicating clearly and professionally

Social media

Independence and objectivity

Holding high expectations for our suppliers



Conflicts of interest

A conflict of interest occurs when your personal interests — family, friendships, financials — compromise your judgment, decisions or actions at work. Actual conflicts of interests are prohibited. For example, you cannot take for yourself any business opportunity meant for Gartner or steer business to an immediate family member or an entity in which the associate has a financial interest. A potential conflict of interest exists when it appears that your interests could conflict with Gartner's interests, but disclosing that potential conflict and seeking approval addresses the situation.

Conflicts of interest must be disclosed promptly for review. Having a conflict of interest is not necessarily a violation of the Code, but failing to disclose it is. Below are examples of potential conflicts of interest:

- Taking on outside employment or advisory work
- Becoming a member of a board of directors or advisory board
- Managing or hiring a relative or someone with whom you have a close personal relationship
- Having an intimate relationship at work
- Holding financial interests in companies or businesses that are competitors of, suppliers to or evaluated by Gartner (depending on your role at Gartner)

Read and follow the [Conflicts of Interest Policy](#), and disclose conflicts via the Disclosure and Approval Process. If you have additional questions, contact [Ethics & Compliance](#).



Key definitions

Immediate family member

An immediate family member is an associate's spouse, domestic life partner or equivalent, dependent children or dependent parents. A separated spouse, separated domestic life partner or equivalent will be considered part of the associate's immediate family if the associate files a joint tax return with the separated spouse.



Relative

A relative is a spouse or domestic life partner, parent, child, sibling, grandparent, grandchild, in-law, nephew, niece, cousin, aunt or uncle.

Financial responsibility and internal controls

We keep complete and accurate financial books and records that properly reflect the substance of transactions and comply with generally accepted accounting principles, Gartner accounting policies and internal control requirements. As a publicly traded company, Gartner complies with all applicable financial reporting and disclosure rules and regulations. We cooperate with internal and external auditors and investigations.

The failure to comply with applicable laws and policies, falsifying, misrepresenting, omitting or concealing any facts or information in our business records, encouraging others to do so, or facilitating or participating in the financial misconduct of any third party with whom we do business will result in disciplinary action up to and including termination of employment. It may also result in criminal penalties for individuals and Gartner.

Before signing a document or authorizing a transaction, ensure you have the authority to do so. Before approving a transaction, consider the business rationale and verify the facts and circumstances.

If you become aware of or suspect any fraud, misrepresentation, reporting inaccuracy, or violation of accounting or internal control requirements, speak up and report it using one of the reporting channels.

Read and follow the [Gartner Authority Matrix Policy](#). If you have additional questions, contact [Legal & Compliance](#).

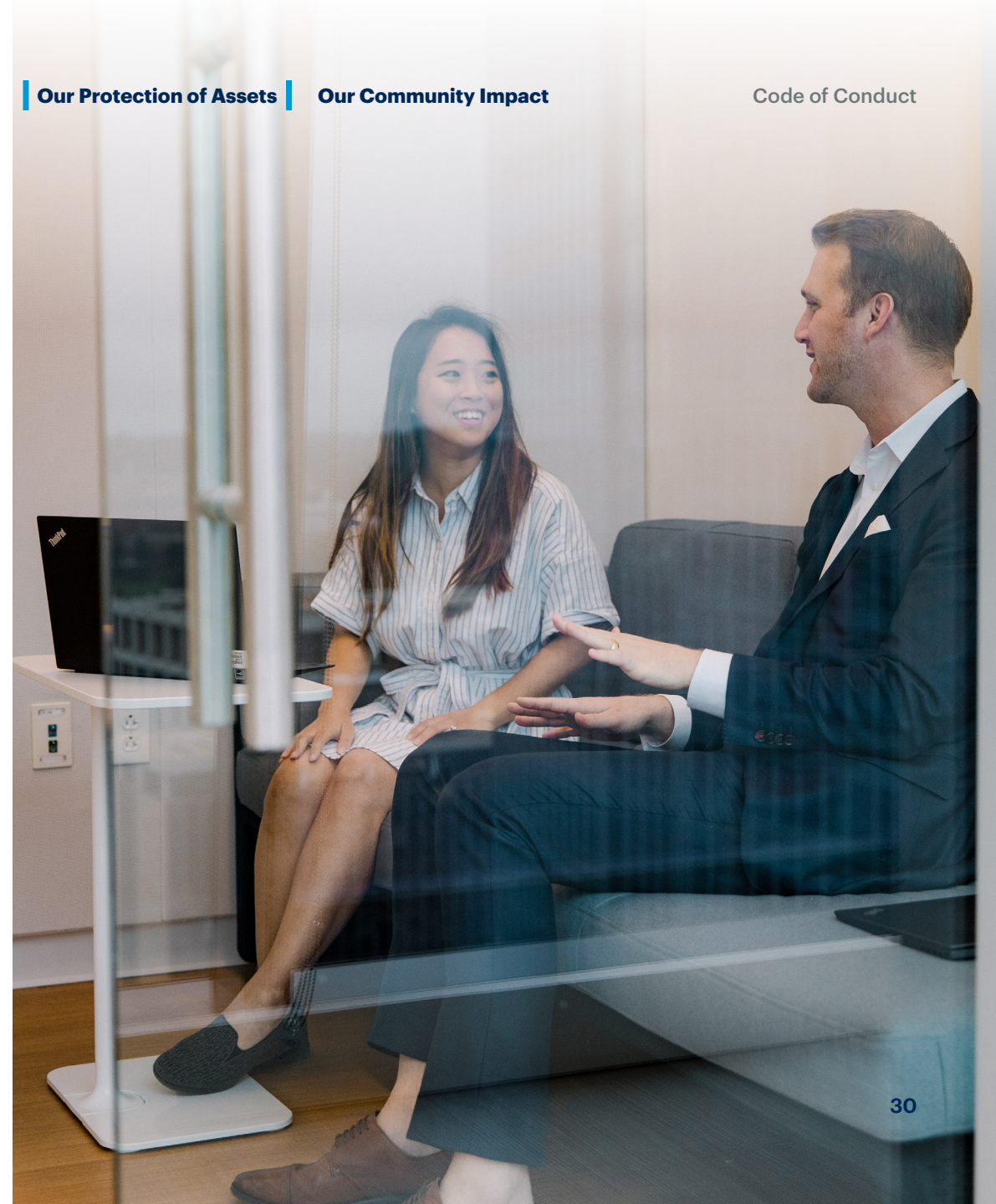


Speak up

For guidance on how to speak up, visit the [reporting channels](#).

Protecting our business and reputation by following our internal controls

- For instructions on proper expensing, please visit the [Travel and Expense Resource Center](#).
- Associates must follow the [Global Procurement Policy](#) when establishing new relationships with suppliers and engaging in ongoing activities with existing suppliers.
- Use Gartner-approved contracts templates and adhere to our contracts, including confidentiality obligations, reporting requirements and other contract terms.
- Follow proper contracting procedures in all agreements you make on behalf of Gartner. This means no side letters or “off the book” agreements that commit Gartner to an obligation outside of company policy or explicit client entitlements.
- Retain and dispose of records in accordance with Gartner’s [Global Record Retention Policy and Storage Policy](#) and related schedules.
- Comply with legal holds. If you are notified that you are subject to a legal hold (a request to retain materials related to an investigation or lawsuit), do not alter or destroy any documents until the hold has been lifted.
- Conduct Gartner business only using your Gartner-approved systems and communication channels.



Information and cybersecurity

We protect against, detect and respond to information security threats to Gartner's assets, networks and data. We continuously monitor for threats, inappropriate disclosures and unauthorized access. We follow all Information Security policies and procedures and have access controls in place to ensure only those with legitimate business reasons have access to information.

Follow these security measures

- Use unique, strong passwords and protect those passwords (e.g., not sharing passwords with others or other systems, using a password manager).
- Use only Gartner-approved systems, tools, hardware, software, extensions, plug-ins, drivers and applications.
- Be diligent when looking for signs of phishing or malicious intent, and [report suspicious emails](#) and [IT incidents](#).
- Protect your Gartner email address using it only for legitimate business purposes and using a personal email address for nonwork-related activities.

Gartner conducts due diligence on suppliers who will have access to our systems to ensure appropriate controls. We do not grant third parties access to our systems without consent and signoff by Information Security.

Never use Gartner's information technology assets to post, upload, download, store, transmit or distribute any threatening, false, slanderous or obscene acts or materials (e.g., pornography). Personal use of Gartner's equipment is limited and cannot interfere with work usage. Further, you are prohibited from engaging in fraud, theft, embezzlement or misappropriation of company property.

Read and follow the policies on the [Information Security Policies Center](#). If you have additional questions, contact [Information Security](#) or the [Gartner Help Desk](#).



Protecting 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. We must protect against inadvertent disclosure outside of Gartner and use the information 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. Further, when you leave Gartner, you may not take any confidential information with you, nor may you share any of this information with your new employer.

We protect Gartner-confidential information, such as research methodologies, research work in progress, unpublished financial data, product and strategy roadmaps, know-how, trade secrets and employee information. We also protect entities that do business with Gartner, including clients, suppliers and supplier price lists.



Question

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



Answer

No. You may not share the fact that a company is a client unless that client has agreed to be a reference. Our clients highly value that level of confidentiality.

As with personal data, when dealing with confidential information, always ask yourself:

- Should I have access to this confidential information?
- Am I allowed to use it for this purpose?

If sharing it with a colleague, does the recipient have a “need to know”? Am I permitted to disclose it to them?

Read and follow the [Information Classification Policy](#). If you have additional questions, contact [Legal & Compliance](#).

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 participating on the web (e.g., via social media posts).



Protecting Gartner content

To protect Gartner's objectivity and proprietary research, we have strict standards that must be followed for how others are granted permission to use our Gartner name and intellectual property (IP) outside Gartner. Never agree that a client or third party can own Gartner IP.

Read and follow the [Content Compliance Policy](#). If you have additional questions, contact [Legal & Compliance](#).

Respecting IP rights

Regarding the use of third party IP that Gartner does not own (such as photographs or screenshots, music, cartoons and video clips, or data compilations), it is important to know that this content is generally protected by IP law and may only be used with permission from the owner.

For example, if you think a photo of a 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. You may need permission from the rock star, too. Do not fall prey to the common misconception that materials you find on the internet are free to use.

Visit the [Intellectual Property Resource Center](#). If you have additional questions, contact [IP Legal](#).

Communicating clearly and professionally

We speak with one voice and communicate accurately, consistently and in compliance with regulatory and legal obligations. Only authorized Gartner representatives are permitted to speak on behalf of Gartner, including to the media, on social media or at events, conferences or tradeshows.

Media inquiries: We direct all media inquiries to the [Gartner Media Relations Team](#).

Investor relations: We direct any outreach from the financial community to the [Investor Relations Team](#).

Government regulator, law enforcement or external law firm: We respond appropriately to and cooperate with regulators and law enforcement. We direct any outreach from a government entity (outside of service fulfillment), a regulator, an external lawyer or law enforcement to [Legal & Compliance](#).

Social media

Social media is part of all our lives. It gives us opportunities to build our personal brands and the Gartner brand. But, we should be keenly aware that every action we take on 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 Gartner in a negative light.

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.

When you adopt your “professional persona” on social media, approach subjects in a thoughtful and professional manner, as a representative of Gartner. Associates who create our intellectual capital, including experts, consultants, executive partners and leadership partners, have a heightened responsibility to represent Gartner’s approved research positions.

Read and follow the [Social Media Policy](#). If you have additional questions, please contact the [Social Media Team](#).

Independence and objectivity

Our clients make critical business decisions based on Gartner insights, data, tools and interactions. They trust that we are independent of outside influence. They count on our expert evaluations and applied methodologies to be objective. Independence and objectivity are synonymous with the Gartner brand. All associates, in every part of the business, are responsible for protecting this most valuable brand asset.

Read and follow [Gartner’s Guiding Principles on Independence and Objectivity](#). If you have additional questions, contact [Ombuds](#).



Holding high expectations for our suppliers

We view our suppliers as partners in delivering on our commitments, and just as we hold ourselves to the highest standards of ethical conduct, 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 with the law, 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](#).



Basic principles of our Supplier Code of Conduct

- A commitment to a work environment that values diversity, respect and integrity
- Protection of Gartner's confidential information and use of good privacy and data security practices
- Execution of business in a responsible manner, with integrity and high ethical standards, and in compliance with all regulatory and legal requirements
- Respect for international human rights principles
- Acknowledgment of and compliance with the [Gartner Supplier Code of Conduct](#)

Ensure any suppliers you hire are onboarded in accordance with Gartner's policies. If you hire suppliers, familiarize yourself with the [Gartner Supplier Code of Conduct](#). If you have additional questions, contact the [Source to Contract Team](#).

Our Community Impact

Giving and volunteering

Environmental sustainability



Giving and volunteering

Our associates live and work in many countries and territories around the world and are deeply embedded in their communities. We are proud of the global impact associates have on their communities. Gartner strives to support each of you in making a positive change where you live, work and serve our clients. We celebrate this spirit of community and caring both within and outside Gartner.

Empowering associates

The Gartner Gives program empowers associate giving by:

- Matching associate contributions to nonprofit organizations up to \$5,000 in a calendar year
- Supporting associate volunteerism
- Administering the Associate Assistance Fund to relieve financial hardship

Understand the rules for charitable giving

- Do not make charitable donations as a quid pro quo in a Gartner business context.
- Charitable donations may not be expensed on behalf of Gartner, unless required by local law.
- All charitable donations must be made as an individual associate expense.

We continue to increase the number of nonprofit organizations eligible for the Gartner Gives Charity Match.

For more information about matching gifts and volunteer opportunities, visit [Gartner Gives](#). If you have additional questions, contact AskHR@gartner.com or CSR@gartner.com.

Environmental sustainability

We strive to minimize our environmental impact and embed sustainable best practices into our operations. We view combating climate change and reducing greenhouse gas emissions as a necessary part of that broader strategy. We embed sustainability into our business and work across business units to implement our decarbonization approach. Our commitment is to achieve net-zero greenhouse gas emissions by 2035 in accordance with the Science Based Targets initiative's Net-Zero Standard.

We are committed to promoting sound environmental practices in our work, and associates play a critical role in this work.

See the [Corporate Responsibility Report](#). If you have additional questions, contact sustainability@gartner.com.



Enforcement and waivers

The Code of Conduct is important to us. Violation of the Code of Conduct may result in disciplinary action, up to and including termination of employment. Only the Board of Directors may waive a provision of the Code of Conduct for a director or executive officer. Any waiver that is granted will be publicly disclosed as required by listing requirements and applicable laws, rules and regulations.

General questions

If you have general questions about the Code of Conduct, feel free to reach out to one of the [reporting channels](#).