

CEO and CFO Code of Ethics

Gartner requires ethical conduct in the practice of financial management throughout the world. The Chief Executive Officer, Chief Financial Officer, Controller, and financial managers hold an important and elevated role in corporate governance. They are uniquely positioned and empowered to ensure that the interests of the Company and its stockholders are appropriately balanced, protected and preserved. This Code of Ethics provides principles that these officers and managers must adhere to and advocate to achieve these ends.

Accordingly, the Chief Executive Officer, Chief Financial Officer, Controller, and each financial manager of Gartner at all times shall be obligated to:

- Embody and enforce this Code of Ethics.
- Ensure that this Code of Ethics is communicated at least annually throughout all financial departments.
- Formally and promptly communicate any breach of this Code of Ethics to the Chief Legal Officer.
- Act at all times with honesty, integrity, and independence, avoiding actual or apparent conflicts of interest in personal and professional relationships.
- Discuss with the appropriate Senior Management level, or, in the case of the Chief Executive Officer, with the Chief Legal Officer, in advance any transaction that reasonably could be expected to give rise to a conflict of interest.
- Provide full, fair, accurate, complete, objective, timely and understandable financial disclosures in internal reports as well as documents filed or submitted to the Securities and Exchange Commission, any other government agency or self-regulatory organization, or used in public communications.
- Comply with all applicable laws, rules, and regulations of the countries and jurisdictions where the Company operates, including the Securities and Exchange Commission, the New York Stock Exchange and other exchanges on which the Company's stock is listed, and other appropriate private and public regulatory agencies.
- Take measures to prevent, detect, and report fraud, bribery, corruption, and improper payments in all business dealings, in accordance with applicable anti-corruption laws and the Company's anti-bribery policy.
- Comply with the Company's policies and procedures.
- Act in good faith, responsibly, with due care, competence, diligence, and without knowingly misrepresenting material facts or allowing sound judgment to be subordinated.
- Protect and respect the confidentiality of information acquired in the course of work, except when authorized or otherwise legally obligated to disclose. Do not use confidential information acquired in the course of work for personal advantage.
- Be recognized as a responsible partner among peers.
- Responsibly use and control Company assets and other resources.

(Revised January 2026)