Gartner - Modern Slavery Statement

Gartner has a zero-tolerance approach to modern slavery and human trafficking and we are fully committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This Modern Slavery Statement reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to help ensure that slavery and human trafficking are not taking place anywhere in our business. Gartner fully recognises that we have a responsibility to be aware of the risks in our business, no matter how remote the possibility, and in our wider supply chain.

About Gartner

Gartner, Inc. (NYSE: IT), together with its global subsidiaries is the world's leading research and advisory company. We deliver the business and technology insight necessary for our clients to make the right decisions, every day. We have expanded well beyond our flagship technology research to provide senior leaders across the enterprise with the indispensable business insights, advice and tools they need to achieve their mission-critical priorities and build the organisations of tomorrow. We are the valuable partner to more than 14,000 client enterprises in more than 100 countries.

Gartner UK Supplier and Supply Chain adherence to our values

Gartner partners with a variety of small to medium size suppliers for the majority of our local requirements and with multi-national suppliers for items such as technology infrastructure and real estate. Gartner has never been made aware of any activities involving either us or our supply chain that would give concern in relation to slavery or human trafficking. In the event that any such incident was highlighted to Gartner, we would promptly take action in accordance with our legal and moral obligations.

Gartner due diligence processes for slavery and human trafficking

We consider the risk of modern slavery, servitude or human trafficking existing within our business or supply chains to be relatively low. Our suppliers are required to agree to comply with our Supplier Code of Conduct (which strictly forbids all forms of slave labour) under our standard term contracts. They must also complete a due diligence questionnaire relating to modern slavery. We will aim to continue to strengthen our review process going forward.

Gartner Global Policies

Gartner has a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policies. Gartner maintains robust recruitment policies, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. We use our internal recruiters to source labour and on the rare occasion when we use an external agency, we always verify the practices of any new agency before accepting workers from that agency.

2. Gartner hotline. Gartner maintains a global hotline which is administered by an independent third party 24 hours a day, 7 days a week. All concerns regarding inappropriate
behavior, policy violations or violations of the law may be raised anonymously, and in 38 languages, on this hotline.

3. **Global Code of Conduct.** Gartner has a global Code of Conduct. This Code explains the manner in which Gartner behaves as an organisation and how we expect our employees to act.

4. **Global Human Rights Policy.** This policy underlines Gartner’s commitment to human rights in the workplace. This commitment includes respecting the dignity and worth of all employees, encouraging all employees to reach their full potential and providing equal opportunities to all employees. The policy also sets out our commitment to respect international human rights principles outlined in the United Nations Global Compact and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

5. **Supplier Code of Conduct.** Gartner endeavours to choose reputable suppliers which conduct their business in an ethical and honest manner, and in compliance with all applicable laws and regulations. As noted above, Gartner requires that suppliers (including the supplier’s employees, representatives and subcontractors) comply with our Supplier Code of Conduct. The Code requires suppliers to commit to conducting business in an ethical and honest manner and in compliance with all applicable laws and regulations, while furthering values of diversity, inclusion, respect and integrity. The Code strictly forbids all forms of slave labour.

**Corporate Responsibility**

In addition to relevant policies such as those listed above, each year we publish our Corporate Responsibility Report. The report underlines Gartner’s commitment to uphold the highest ethical standards throughout all our global operations. It measures our performance against key environmental, social and governance ("ESG") metrics referencing leading reporting frameworks. These metrics include our commitment to both human rights and responsible sourcing. We have established a Corporate Responsibility Executive Council to oversee all corporate responsibility programs, monitor the environmental impact of Gartner operations and provide guidance to the Operating Committee (our executive leadership team) on ESG issues. Our commitment to continuous improvement in our approach to corporate responsibility remains steadfast.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Gartner’s slavery and human trafficking statement for the financial year ending December 31, 2020. It will be reviewed and updated annually.

Craig W. Safian

*On behalf of Gartner U.K. Limited
as Director*