

## PRINCIPLES OF ETHICAL CONDUCT

Gartner is committed to conducting our business to the highest standards of business practices, and to preserving the integrity of our brand. We expect every Gartner associate to work with integrity and professionalism.

This Gartner Principles of Ethical Conduct represents our attempt to define Gartner's expectations of how each of us conducts ourselves every day. We cannot anticipate or define standards of behavior for every situation that might arise. We must use our best judgment and moral sense to perform our job responsibilities in an ethical manner within both the letter and spirit of this Policy and Gartner's other policies. This Policy is not intended as a substitute for Gartner's Code of Conduct Policy or for other more detailed policies that relate to standards of conduct. For ease of reference, some of these underlying policies are accessible by hyperlinks directly from this document.

- **Comply With Applicable Laws.** Gartner takes seriously our collective obligation to adhere to all laws that govern our personal and professional actions. You must strictly comply with all applicable laws and regulations of the jurisdictions where you work or do business. While not an exhaustive list, this includes complying with laws and regulations concerning Financial Reporting, Insider Trading, Antitrust, Copyright, Foreign Corrupt Practices and Data Protection. For further information and guidance, see Gartner's Code of Conduct Policy, sections entitled *Summary of Laws and Regulations* and *Insider Trading and Stock Tipping*; and separate Insider Trading Policy.
- **Help Provide a Safe Work Place.** All of us deserve to work in an environment free of violence, threats of violence, or intimidation. It is Gartner's policy to strictly prohibit any verbal abuse, threatening behavior, or conduct that may endanger persons or property. This includes possession of any firearm or other weapon on Company property. See the policy entitled Policy Regarding Mutual Respect (Avoiding Unlawful Harassment) and Safety in The Workplace for more information.
- **Treat Fellow Employees With Respect and Dignity.** You must avoid any comments or behavior toward others that may reasonably be regarded as harassment, or as reflecting bias on the basis of race, religion, national origin, age, sex, sexual orientation or disability. See the policy entitled Policy Regarding Mutual Respect (Avoiding Unlawful Harassment) and Gartner's Equal Opportunity Statement for more information.
- **Protect Gartner's and Our Clients' Confidential Information.** Gartner considers all of its business information, whether about Gartner or others, to be confidential and important business assets. You must comply strictly with your signed confidentiality agreement with Gartner, Company policy and the law, and protect the confidentiality of both Gartner's business information and the business information of our clients. Even if you leave Gartner, you must carefully protect information provided by clients who have been promised confidentiality. In addition, you must never use improper means to obtain the confidential information of any other person or business. For further information and guidance, see Gartner's Code of Conduct Policy, sections entitled *Confidentiality of Client Information* and *Key Areas of Responsibility* and the Agreement Regarding Certain Conditions of Employment.

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- **Avoid Conflicts Of Interest.** You must avoid situations where you have an actual conflict of interest with Gartner, or where the appearance of a conflict of interest may be perceived. This includes not engaging in any outside employment without the prior written permission of senior management, not having a financial interest in, or affiliation with, competitors of Gartner, not serving on outside Boards of Directors without senior management approval, not accepting valuable gifts from business contacts, and not engaging in political activities with Gartner funds, equipment, facilities or supplies. Additional restrictions may apply to you, depending on your position and job responsibilities at Gartner, and you must be sensitive to, and familiar with, applicable conflict of interest rules. For example, you must not have a financial interest in companies that do business or seek to do business with Gartner if you are in a position to influence decisions affecting that business. If you are involved in procuring goods or services for Gartner, you must take special care to avoid so-called 'related party' transactions, which involve contracts with Gartner suppliers or others that directly or indirectly confer a financial benefit on Gartner employees or their relatives. If you are an analyst, you must not own stock in a company that you follow on behalf of Gartner, or that is within an industry or sector that you follow, either directly or as a supervisor. You should review and understand the Company's Conflict of Interest Policy, and Policy Regarding Associates Serving on Boards of Directors for guidelines in this area.
- **Project a Positive Image of Gartner.** As Gartner employees, we owe the Company a duty of loyalty. We should all be mindful that we represent Gartner in our day-to-day dealings with outsiders, and can have a significant influence over how Gartner is viewed in the business community. You should present Gartner in a positive light in your verbal and written statements about the Company, and avoid making derogatory comments about Gartner, our products, services, management, employees and systems. See Gartner's Code of Conduct Policy, section entitled *Meeting With the Public and Investor Relations* and Internet Posting Policy.
- **Act Ethically In the Handling and Reporting of Data.** Gartner relies on each of us to use the highest degree of personal integrity in reporting any kind of data or information to the Company, to our clients, and to the financial community. It is your responsibility to provide complete and accurate information when it is requested, and to input only accurate information into the Company's books and records. Any records, expense reports, financial reports and other data presented to Gartner, our clients, and other appropriate parties must be complete and accurate. These obligations have a special significance for Gartner's financial management associates, who are uniquely capable and empowered to ensure that the interests of all those who have a stake in Gartner's financial integrity are appropriately balanced, protected and preserved. See Gartner's Code of Conduct Policy, section entitled *Accuracy of the Company's Books and Records* and *Ethical Principles For Financial Management Associates*.
- **Avoid Substance Abuse.** You must never sell, use, possess or be under the influence of illegal drugs, or improperly use, possess or be under the influence of alcohol while on Company premises or while engaged in Company business, including Company or client sponsored events. Exceptions may be made for reasonable consumption of alcohol provided by the Company at Company or client sponsored events. See Gartner's Code of Conduct Policy, section entitled *Substance Abuse*.

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**Do You Know About Improper Conduct at Gartner?** We strongly encourage you to report any situations you know about that may involve illegal, unethical or otherwise improper business activity, as well as all instances of employee violations of these Principles of Ethical Conduct or any of Gartner's other policies. If you believe someone is engaged in improper or illegal conduct, you should immediately bring it to the attention of your manager, human resources representative, or the General Counsel. You should have no fear of suffering retribution or other adverse employment actions as a result of reporting improper conduct. For further information and guidance, see Gartner's Code of Conduct Policy.