

Code of Conduct

Introduction

The Gartner Code of Conduct outlines our expectations for how we conduct ourselves in the workplace and beyond, and will help you determine the right decisions to make in varying business situations.

Adhering to the Gartner Code of Conduct and all Gartner policies is a condition of employment for all Gartner associates. Because it would be impossible to create a rule for every situation that might arise, we must use our best judgment to perform our job responsibilities in an ethical manner — in compliance with applicable laws, this Code and other Gartner policies.

By upholding the standards of conduct outlined in this Code, you are making a positive contribution to the work environment we all enjoy. If you are ever in doubt about a particular action and whether it complies with this Code, just ask. Don't hesitate to seek guidance from your manager, your HR representative or the legal department.

Applicability

This policy applies to all associates of Gartner and to all others who perform services on the company's behalf, regardless of employment status (temporary workers, independent contractors, sales agents, part-time/full-time associates, managed service employees), and has been adopted as the Code of Conduct by all Gartner operating subsidiaries and affiliates around the world.

The rules of behavior discussed in this Code apply not only to Gartner office locations, but also to Gartner events, client locations and any other location where you are conducting Gartner business or representing the company, whether during or outside of normal business hours.

We expect all associates to adhere to these standards at all times as a condition of their employment.

Values

INTEGRITY

Do the right thing.

OBJECTIVITY

Be independent and unbiased in everything we do.

NO-LIMITS MIND-SET

See opportunities where others don't.
Never settle for the status quo.

COLLABORATION

Work together in teams to accomplish more than what is possible individually.

RESULTS

Execute consistently using global best practices.

Dear Colleagues:

Over our 30-year history, Gartner has become the world's leading and most respected information technology research and advisory company. The Gartner brand is associated with world-class, independent and objective insight on virtually every area of IT and supply chain management.

This reputation has been gained through a commitment to the highest ethical and legal standards in our interactions with our clients, our stakeholders and each other. This culture of integrity is essential to Gartner's continued growth and success.

Our senior management team and our board of directors embrace this commitment because it forms the foundation of trust on which our business is based. Our greatest asset — the Gartner name — and the continued success of our business depend on our reputation.

The Gartner Code of Conduct contains principles that reflect our values and serves to guide each of us in how we do our work every day.

Each of us must carefully read the Code, understand how it applies to us and those with whom we work, and comply with it at all times. Additionally, each year commencing in 2012, you will be asked to affirm that you have read, understand and agree to comply with the Code.

You are encouraged to raise any concerns you may have about inappropriate behavior. If you encounter a situation that you believe might violate the Code or any other Gartner policies, or if you have concerns about business practices or possible misconduct, you should report them to your manager, the legal department or the Gartner Anonymous Hotline. You have our assurance that there will be no retaliation for asking questions or raising concerns.

Thank you for joining us in our continued commitment to conduct ourselves ethically and appropriately.

Sincerely,



Gene Hall, Chief Executive Officer

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At Gartner, our associates and our brand are our most important assets. Your reputation and integrity as a representative of the company are critical for our continued success because our reputation is impacted every day by your actions on and off the job. We expect you, therefore, to maintain appropriate standards of professional behavior.

Here are a few simple rules to help you meet our expectations:

- Do not violate the law.
- Ensure that your everyday actions are consistent with the Code of Conduct.
- Never engage in any misconduct that could jeopardize the company's brand or our client or vendor relationships.
- Avoid any appearance of impropriety.
- If you are ever in doubt about an action, don't just proceed, ask for guidance in advance.

We'll discuss these rules in more detail, with examples, throughout this Code, but do not consider this document a complete list. Remember, if you ever have a question, contact your manager, your HR representative or the legal department.

Protection From Discrimination and Harassment

It is important that you avoid any comments or behavior that another individual might reasonably consider as negative or biased regarding the following categories:

- Race
- Religion
- Ethnicity
- National origin
- Age
- Gender
- Sexual orientation
- Disability status
- Veteran status

EXAMPLE: PROTECTION FROM DISCRIMINATION AND HARASSMENT

Sally, a sales associate, is a great admirer of her local fire department and, as a token of her esteem, has prominently pinned to the wall of her cubicle this year's calendar displaying a select group of her town's bravest in suggestive poses and various states of undress. Almost all of Sally's co-workers find the calendar quite amusing, with one exception. Her neighbor in the next cube, Ruthie, averts her eyes each time she walks by and mentions to her HR representative that she finds the display offensive and unprofessional.

ANALYSIS

HR should require Sally to remove the calendar, because such a photographic display may create a "hostile work environment" — a form of sexual harassment.

Did you know?

Intent does not matter. In the example to the right, even if Sally did not intend for it to be offensive, it is Ruthie's perception that is important.

Your actions =
Our reputation

We will not tolerate harassment or derision of any nature, and the company expects you to behave in full compliance with these guidelines. For more information, see the “Equal Employment Opportunity” and “Harassment Free Workplace” policies.

If you experience or witness sexual or other harassment in the workplace, immediately report it to your manager, your HR representative or the legal department. Gartner is committed to addressing all complaints promptly and fairly.

Providing a Safe Workplace

We all deserve to work in an environment free of violence, threats of violence or intimidation. Company policy prohibits any verbal abuse, abusive emails, bullying, threatening behavior or conduct that may endanger persons or property, including possession of any firearm or other weapon on company property. For more information, see the “Harassment-Free Workplace,” “Smoke-Free Work Environment” and “Violence and Drug-Free Work Environment” policies.

Avoiding Substance Abuse

You may not sell, purchase, use, possess or be under the influence of, alcohol or any illegal substance while on the company’s premises or at any company-sponsored or business-related function. You may consume alcohol, in reasonable quantities, if it is provided by the company at a company or other business-related function, and only if your consumption does not interfere with your duties at the function or the company’s reputation. For more information, see the “Violence and Drug-Free Work Environment” policy.

EXAMPLE: CONFLICTS OF INTEREST

Vince, a research analyst, has been invited to serve on the board of directors of a startup IT vendor in the market segment he covers for Gartner. The vendor company is anxious to benefit from Vince's wide experience in the field and is so sure that Vince's membership on the board will help its long-term growth that it offers Vince \$25,000 in stock options as an incentive.

ANALYSIS

Vince may not accept the offer because the stock options would give him a financial interest in a company within his coverage sector, which is an impermissible conflict of interest for a Gartner analyst.

EXAMPLE: CONFLICTS OF INTEREST

Pete is managing a significant procurement for Gartner, the purchase of a large number of the latest handheld wireless telecommunication devices, which retail for \$600 each. A few months later, the winning bidder, Mixed Berry Systems, shows its appreciation to Pete by sending him one of the devices as a holiday gift.

ANALYSIS

Pete must return the gift and explain that the Gartner Conflict of Interest policy prohibits the acceptance of expensive gifts from companies with which Gartner does business.

Applicable Laws and Regulations

As a global company, Gartner is subject to the laws and regulations of all the jurisdictions where we do business. You are expected to know the applicable laws and regulations that relate to your job responsibilities, and to comply with all laws and regulations where you work or do business. This includes locations where you are traveling to conduct Gartner business.

If you are uncertain about the laws affecting your responsibilities, or whether a certain action or practice complies with the law, contact the legal department for assistance and clarification.

This Code covers some, but not all, of the significant laws and regulations that you and the company must comply with at all times.

Conflicts of Interest

You must avoid situations where you have an actual conflict of interest with Gartner, or where others may perceive a conflict of interest.

The following list of examples is not exhaustive, and additional restrictions may apply to you depending on your position and job responsibilities:

- You may not undertake any outside employment, including serving on outside advisory boards or boards of directors, without the prior permission of the General Counsel and your manager. For more information, see the "Outside Board Membership" policy.
- You may not have a financial interest in, or affiliation with, competitors of Gartner.
- You may not accept valuable gifts from business contacts.

- You may not run for political office without the permission of the General Counsel and your manager, and may not engage in political activities of any kind using Gartner funds, equipment, facilities or supplies.
- If you are involved in procuring goods or services for Gartner, you must disclose to the General Counsel and your manager any proposed contracts with Gartner suppliers or others that directly or indirectly confer a financial benefit on you or your relatives.
- If you are an analyst, you may 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.

For more information, see the “Conflict of Interest” policy.

Insider Trading

You may not trade securities (stocks, bonds, options, etc.) based on important (also called “material”), nonpublic information about Gartner or any other publicly traded company (including information about our clients or vendors that we cover). This is considered insider trading, and it is illegal.

You may not disclose that information to others so that they can improperly trade (buy, sell or hold) those securities. This is considered stock tipping, and it is also illegal.

Insider trading and stock tipping can result in substantial civil and criminal penalties, which could mean fines or even going to jail. For more information, see the “Insider Trading” and “Regulation Fair Disclosure” policies.

EXAMPLE: INSIDER TRADING

Amy, an assistant in Finance, is present at a meeting taking place before Gartner is scheduled to report its quarterly earnings. She learns that quarterly revenues are tracking well ahead of Wall Street’s expectations, and since the Gartner trading window is open, she places a “buy” order through E-Trade to purchase 100 shares of Gartner stock. She also passes the exciting news along to her brother-in-law, who calls his broker and places a “buy” order for Gartner stock.

ANALYSIS

Both Amy and her brother-in-law violated insider-trading laws (and, in Amy’s case, the Gartner Insider Trading policy) because both traded in Gartner stock on material, nonpublic information. In addition, Amy violated the securities laws by improperly “tipping off” her brother-in-law regarding such information.

Did you know?

Enforcement agencies around the world, such as the U.S. Securities and Exchange Commission, or S.E.C., have very sophisticated detection techniques, so don’t think that small amounts will go unnoticed!

Treat a client's confidential information the way you'd like them to treat Gartner's confidential information.

Confidentiality

Gartner Information

Gartner develops and uses a wide variety of confidential information, including these examples (not an exhaustive list):

- Computer programs
- Computer access information
- New business ideas
- Product plans
- Marketing plans and strategies
- Sales and other forecasts
- Client lists
- Trade secrets
- Proposed mergers and acquisitions

Associates who handle or have access to confidential information may not improperly use or disclose it, and are expected to protect such information from improper disclosure.

Always exercise caution when discussing sensitive information, especially when you are in public places such as elevators, hallways, restaurants and social gatherings, including social media. You may not take any materials that contain confidential information with you upon termination of your employment, nor can you share any such confidential information with your new employer or any other person after you leave the company. Gartner reserves the right to review the materials you intend to take when you leave.

Client Information

In the course of our research and consulting work, clients entrust us with confidential information to help them make important business decisions. It is every associate's responsibility to safeguard all confidential client information obtained in any manner, and to treat such confidential information in the same manner as we treat Gartner's confidential information. In addition, it is our policy to hold our clients' identities (both corporate and individual) in confidence and not to disclose them to another client, vendor or any other organization without their permission.

Vendor and Other Third-Party Information

Gartner routinely receives business information from a variety of other sources, including technology providers we cover in our research, prospects we call on to sell our services, and other third parties with whom we do, or may do, business. In many cases, this information is provided to us under written nondisclosure agreements (NDAs) or even verbal understandings that certain information will be kept confidential.

Handling all confidential information in a highly professional manner promotes the company's integrity and its relationships with clients, vendors and other business partners. The failure to honor confidentiality obligations may expose the company to legal risk, liability and damages. Accordingly, you must safeguard any confidential information entrusted to us under these circumstances. Only use the standard Gartner NDA form, and follow related processes. Any other form will require pre-approval by the legal department.

For more information about your confidentiality obligations, see the Confidentiality Agreement and/or the Agreement Regarding Certain Conditions of Employment, the "Protection of Trade Secrets" policy and the "Insider Trading" policy.

EXAMPLE: CONFIDENTIALITY

Craig has been hard at work on a benchmarking study comparing a client's IT infrastructure costs to those of its peers — an engagement that has given him access to both the Gartner proprietary database and the client's highly confidential cost data. After the engagement is completed, Craig decides to leave Gartner to pursue a career as a freelance technical writer. On his last day, he forwards a copy of the client deliverable to his home computer, with the intention of using it as a writing sample to show prospective clients, none of whom are likely to be competitors of Gartner or of our benchmarking client.

ANALYSIS

By downloading both Gartner's and a client's confidential business information to his home computer when he was leaving the company, Craig acted illegally and in violation of Gartner policy. Remember, this Code applies to all employees and consultants.

Safeguarding Company Assets

The company's assets are made available to you to help you perform your job responsibilities and should only be used for one purpose: the benefit of Gartner. These assets include the company's funds, office supplies and computer equipment, as well as intellectual property (such as business plans, financial information, ideas for new services and products, customer lists, trademarks, copyrighted material and other confidential information as described above), office space, etc. If you leave the company's employment, any such assets in your possession must be promptly returned. For more information, see the "Protection of Trade Secrets" and "Internet, Email and System Usage" policies.

Not Using Improper Means to Acquire Confidential Information

In addition to your duty to safeguard Gartner's and our clients' confidential information, you may not use improper means to acquire someone else's confidential information or trade secrets. "Improper means" may include any of the following:

- Fraud or other illegal means
- Tricking or misrepresentation
- Bypassing security precautions designed to protect trade secrets
- Obtaining confidential information from a fellow Gartner associate, that belongs to their former employer
- Bribing in order to receive information that is another's trade secret
- Concealing or misstating the nature of your employment or the identity of your employer (sometimes called "pretexting") to receive information that is another's trade secret

You must also be careful not to obtain or learn about another company's trade secrets by any improper means, including from someone who you know, or have reason to believe, is required to maintain the trade secrets' confidentiality. You may not solicit or accept information regarding any company's trade secrets from former associates, suppliers or agents of that company, unless it is in connection with work we are doing for the company and we have its permission.

Any documents received containing confidential information or trade secrets should be forwarded immediately to the General Counsel, who will determine how to proceed.

Books and Records

As a public company, Gartner is required to maintain accurate books and records, and a set of internal controls and processes providing reasonable assurance that:

- All business risks are identified and properly mitigated
- All business transactions are properly authorized by the appropriate level of management
- All transactions are recorded in a complete, accurate and timely manner, and in accordance with applicable accounting principles
- All financial statements are prepared in accordance with generally accepted accounting principles
- Access to assets of the company is in accordance with management's authorization
- All transactions recorded are real, and the existence of recorded physical assets is periodically reviewed
- All company controls that apply to your job function are followed

EXAMPLE: BOOKS AND RECORDS

It's a high-pressure time at Gartner as the fiscal year enters its final hours. Carly, who works in client financial services, notes that a large client order on her desk lacks the required client signature needed to book an order and recognize revenue. Carly promptly contacts the account executive, her close friend Sally, and explains that the order cannot be booked for the fourth quarter without a client signature in hand by midnight. Sally, who needs to have the sale booked in the fourth quarter to qualify for Winners Circle, knows that the client has left on a weekend cruise and won't be reachable for two or three days. Sally implores Carly to book the sale, promising to deliver the client signature by Tuesday, January 2, at the latest. Carly reluctantly agrees and is relieved when the signed documentation does indeed arrive on January 2, as promised.

ANALYSIS

Both Sally and Carly violated the Code of Conduct by intentionally causing a sale to be booked for the fourth quarter, contrary to known revenue recognition rules.

A simple summary of these requirements is: Full, fair and accurate disclosure — always!

Certain people at Gartner are authorized to sign or approve certain things according to our signature authority rules. Familiarize yourself with the levels of management authority required to approve various transactions, as detailed in the “Delegation of Authority” policy.

If you know of, or believe, a problem exists with our books and records, or if you are concerned about improprieties with accounting or auditing matters, contact your manager, the legal department or the Gartner Anonymous Hotline.

Senior financial officers and professional staff hold an important and elevated role in corporate governance and in maintaining the integrity of the company’s business information, particularly because of our status as a public company. Gartner Invest associates should review “Compliance Guidelines for Gartner Invest.” Associates in Finance should review the “Ethical Principles for Financial Management Associates” policy.

Privacy

Gartner respects the privacy of individuals, including and not limited to, our associates and our clients. We all must handle personal data responsibly and in compliance with all applicable privacy laws. Associates who handle the personal data of others must:

- Act in accordance with applicable law
- Act in accordance with any relevant contractual obligations
- Collect, use and process such information for legitimate business purposes only
- Limit access to the information to those who have a legitimate business purpose for seeing the information
- Use all reasonable efforts to prevent unauthorized disclosure

Examples of personal data include:

- Address
- Age
- Educational information
- Medical information
- Financial account numbers
- Social Security number
- National Identity number
- Race
- Religion
- Sexual orientation
- Criminal convictions
- Political affiliations

Ignorance of
the law is not
a defense.

“But everyone does it” is not an acceptable excuse.

Antitrust Laws

In the U.S. and many foreign countries, trade regulation laws prohibit agreements and business practices that restrain or monopolize trade. When participating in trade industry associations, or meetings and conversations with clients, suppliers, competitors or former associates, avoid discussions related to prices, terms of sales, market share, clients, suppliers or sales territories in a manner that could be interpreted as limiting or restricting competition.

EXAMPLE: ANTITRUST LAWS

Philip, a senior sales associate in Europe, has organized a two-day gathering of CIOs from the same industry to brainstorm, share ideas and discuss common IT-related issues. He will moderate the meeting and believes it will provide valuable leads for new business that will assist him in meeting his quota. The CIOs propose an agenda that includes discussions of product and vendor pricing and model licensing terms.

ANALYSIS

The discussion topics suggested by the CIOs present a very real danger of antitrust violations with significant legal implications for both Gartner and the CIOs. Additionally, these types of gatherings involve difficult legal situations, and such exchanges, even with good intentions, could lead to claims against Gartner of “concerted action” among the CIOs in violation of antitrust laws. The legal department should always be consulted in advance of any such gatherings so that appropriate antitrust guidelines can be provided.

EXAMPLE: BRIBERY AND CORRUPTION

George, a sales associate with responsibility for governmental accounts in the APAC region, is trying to close a major deal with an agency of the Chinese government. It has been quietly suggested to George that it would be of assistance in securing the deal if Gartner were to make a cash contribution to a charity run by the wife of the agency's head of procurement. George knows that this is simply the way business is done in the territory, and that other companies have been doing it for years, with results to show for it. In addition, because the procurement official is an avid golfer, George flies the gentleman to a town in Scotland with a famous golf course for some sales meetings with "Mr. Green," all at Gartner's expense. Accompanying the procurement official on the trip, also at Gartner's expense, is the CEO of a Chinese company on George's prospecting list who will join the golf foursome. George's efforts bear fruit, with a significant new contract for Gartner.

ANALYSIS

Upon learning of these events, George's manager should promptly report George's actions to the General Counsel as a possible violation of the FCPA and the U.K. Bribery Act. The contribution to a charity run by a government official's relative was requested, and the lavish travel and entertainment provided via the golf outing could be regarded as bribing a government official, as well as a private-sector employee, in order to obtain business. If George did not accurately describe these events in his expense reimbursement form, he would have also violated Gartner policies regarding Books and Records.

Bribery and Corruption

The U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act and similar laws prohibit offering, paying, accepting or receiving payments or other things of value to obtain or retain business or an advantage in the conduct of business.

For example, the law prohibits us or our partners from inducing someone to act favorably on proposed business or regulatory decisions, based on something of value. These prohibitions apply to our dealings with both foreign government officials and private-sector employees, even when such practice may be customary in the jurisdiction.

In the public sector, the laws are often more strictly enforced, and you must not make or offer any payment or other thing of value that you reasonably believe will be given to any foreign official, associate of a foreign government or foreign political party, or party official.

These prohibitions also include payments to agents or intermediaries when there is reason to believe that they will be using the funds for prohibited purposes. For more information, see the worldwide "Anti-Bribery" policy. In addition, if your job responsibilities include selling or supervising the sale of Gartner services to clients located outside the U.S., particularly foreign government entities, you are required to participate in the company's Anti-Bribery training program. For more information, contact your HR representative or the legal department.

Did you know?

Something of value can be anything of value, even small items. An advantage can be not just winning a deal, but any advantageous terms.

Copyright Laws

Gartner uses computer software that is licensed from a variety of outside companies. The company does not own this software and does not have the right to copy it or any of its related documentation without permission. This applies to downloads, file sharing and similar ways of obtaining software. You must obtain and use software only in accordance with the applicable license agreements, copyrights and fee structures.

Similarly, materials such as photographs, prerecorded music, cartoons and video clips are generally protected by copyright and can only be used with permission of the copyright owner, including in research publications and event presentations. Any associate who misuses software or its related documentation, or otherwise violates copyright laws, is subject to discipline, up to and including termination.

EXAMPLE: COPYRIGHT LAWS

Andy is an analyst preparing a PowerPoint presentation for Symposium/ITxpo. To enhance audience interest, he'd like to spice up his piece with some fun and interesting visual elements. Surfing the Web, he comes across some things that complement his presentation perfectly: a popular comic book character, a still photograph of an award-winning actor, and a product shot of an HP printer. He also plans to incorporate a few seconds of video footage from a well-known game show he has taped off the air.

ANALYSIS

Andy may not use any of these materials without permission because they are all protected by copyright, and in the case of the photograph of the actor, are protected by the actor's rights of privacy and publicity.

EXAMPLE: GARTNER IMAGE

Milton, from Events Marketing, is at a company event and thinks, “I’m at a Gartner event, but the meetings are over and we’re at the bar. Now I can do what I want!”

ANALYSIS

Don’t make this mistake! Milton cannot do “what he wants” in this situation. He must comply with the Code of Conduct and all Gartner policies at all times when attending a Gartner event.

Gartner Image

As a Gartner associate, you are expected to create a good impression at all times and project a positive and supportive attitude about the company and its products and services. You should not make derogatory comments about the company, its products, services, management, associates and systems. In addition, you should not discuss the company’s plans, strategies or results with clients, securities analysts, investors or members of the press. The company needs to maintain a single line of contact with the investment community and with the media and press. Therefore, you should refer all inquiries to the head of Investor Relations or the General Counsel.

For more information on contacts with the investment community, see the “Regulation Fair Disclosure” policy. Also, given the increasing popularity of social media sites on the Internet, we strongly encourage you to review the “Web Participation Guidelines,” which set forth specific expectations of associate conduct on the Internet.

See it?
Report it!
No retaliation.

Because we all have a stake in the company's success, it is in all of our interests to help ensure that our business is conducted to the highest ethical standards, and that our reputation remains untarnished. For this reason, 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 this Code of Conduct or any of the other Gartner policies. Doing so will allow the company to address the issue and take appropriate corrective action.

If you believe someone is engaged in improper or illegal conduct, you should immediately bring it to the attention of your manager, HR representative or the legal department. You may also report any such conduct to the Gartner Anonymous Hotline: 1 877 277 3154.

No Retaliation

You should have no fear of retaliation due to your report, as long as you have acted in good faith and believe what you reported to be true. The company will attempt to treat any such reports or discussions in confidence, subject to the need to conduct a thorough investigation where appropriate. Basically: See it, report it — and there will be no retaliation.

Gartner Anonymous Hotline

Report any issue of concern first to your manager. Alternatively, if you are uncomfortable discussing the matter with your manager, you may report the matter to: the head of your business unit or department; the SVP, Human Resources; or the SVP, General Counsel. In addition, Gartner provides a hotline, administered by a third party, to which concerns may be reported anonymously. The hotline number is 1 877 277 3154 and can be called within or outside the U.S.

Compliance With This Code

Remember, compliance with this Code of Conduct is monitored by the company on an ongoing basis. Failure to comply with this Code or other company policies, or disregard for their intent, constitutes grounds for disciplinary action, up to and including termination of employment.

Anonymous Hotline
1 877 277 3154

Gartner Policies (Referenced in this document)

Anti-Bribery

Compliance Guidelines for Gartner Invest

Conflict of Interest

Delegation of Authority

Equal Employment Opportunity

Ethical Principles for Financial Management Associates

Gartner Anonymous Hotline

Harassment-Free Workplace

Insider Trading

Internet, Email and System Usage

Outside Board Membership

Protection of Trade Secrets

Regulation Fair Disclosure

Smoke-Free Work Environment

Violence and Drug-Free Work Environment

Web Participation Guidelines

POLICY TITLE

Code of Conduct

GEOGRAPHIC COVERAGE

Global

POLICY OWNER

Senior Vice President, General Counsel
Senior Vice President, Human Resources

DATE OF REVIEW

April 2012