



IHS Markit™

Policy prohibiting discrimination, harassment and retaliation

January 2019

Purpose and summary

IHS Markit strives to maintain a workplace that fosters mutual respect and promotes harmonious, productive working relationships. Our goal is to promote a work environment in which all colleagues have an equal opportunity to succeed. The objective of this policy is to outline the company's commitment to prohibiting discrimination, harassment (including sexual harassment), retaliation and bullying in the workplace.

Scope

This policy applies globally to all IHS Markit employees, applicants for employment, interns, consultants and independent contractors. Where applicable and necessary, this policy will be supplemented by the local law of those jurisdictions where we do business.

Conduct prohibited by this policy is not limited to the physical workplace itself. It can occur while employees are traveling for business or at company related events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, discrimination or retaliation, even if they occur away from the workplace premises, on personal devices or during non-work hours.

Policy

Discrimination, harassment (including sexual harassment), retaliation and bullying are not permitted at IHS Markit and are unlawful under applicable laws in the jurisdictions in which we operate.

In order to maintain an inclusive workplace free from acts of discrimination and harassment, IHS Markit is committed to making all employment decisions based on job-related qualifications and without regard to race, color, sex, age, disability, medical condition, physical appearance, marital status, national origin, ancestry, alienage or citizenship status, pregnancy, ethnicity, religion/creed, disability, genetic information, gender (including gender identity or gender expression, or status as a transgender person), sexual orientation, military or veteran status, marital or familial status, status as a victim of domestic violence, stalking or sex offenses, or any other category protected by applicable law ("protected characteristics").

For purposes of this policy, harassment is defined to include all conduct that improperly interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. Harassment may be physical, sexual, verbal or visual, and may be based on personal traits or any protected characteristics such as those listed above.

Examples of prohibited harassment include, but are not limited to threatening, intimidating or hostile acts, offensive oral or written comments, jokes, slurs, epithets, stories or questions, negative stereotyping, comments that denigrate or show hostility or aversion towards an individual, characteristic or group (including via emails, texts, instant messages, etc.), displaying offensive objects or pictures, making graphic comments about an individual's body, making lewd or offensive gestures, and unwanted touching of any kind. Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

“Power harassment” (also known as abuse of power or bullying) is defined as any kind of behavior aimed at a person in the same workplace that, taking advantage of one’s superior position and going beyond the appropriate scope of duties, inflicts physical or psychological pain on that person or negatively impacts the working environment.

“Sexual harassment” is a form of harassment that includes unwelcome sexual behavior or advances, requests for sexual favors or unwanted verbal, written or physical conduct of a sexual nature. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual’s sex when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual’s employment.

Examples of sexual harassment include, but are not limited to:

- Displays or distributions of sexually suggestive materials or communications, including pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace;
- Comments, jokes, foul or obscene language of a sexual nature or regarding another’s body, appearance, sexuality, sex life, gender identity, gender expression, or sexual orientation;
- Propositions or other verbal or physical advances or requests for sexual favors or repeated unwanted requests for dates;
- Sexual gestures and other unwelcome or offensive flirtation or physical behavior including touching, grabbing, fondling, kissing, massaging, intentional pushing or brushing up against another’s body or invading someone’s personal space, rape, sexual battery, molestation or attempts to commit these assaults; and
- Sex stereotyping, which occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people’s ideas or perceptions about how individuals of a particular sex should act or look.

Sexual harassment can occur between any individuals, regardless of their sex or gender. IHS Markit prohibits explicitly or implicitly making submission to sexual advances a term or condition of employment, making threats after a negative response to sexual advances, or using submission or rejection of sexual advances as a basis for any employment decision. This policy applies to intentional and unintentional discrimination, bullying and harassment of/by colleagues and non-colleagues, such as vendors, applicants, customers or guests.

Accountability

All IHS Markit colleagues are expected to follow the standards of behavior outlined in this document, attend corresponding training sessions, promote a workplace environment consistent with all IHS Markit policies and adhere to the regulations and laws within the localities in which they live and work. Harassment, discrimination or retaliation in violation of this policy will not be tolerated

and is strictly prohibited. Any employee who engages in discrimination, harassment, retaliation or bullying will be subject to discipline, up to and including termination of employment.

Managers and supervisors

Managers and supervisors must act expeditiously and fairly when they have any knowledge of harassment or discrimination within their departments, whether or not there has been a written or formal complaint. Managers and supervisors who receive a complaint or information about suspected harassment or discrimination, observe what may be harassing or discriminatory behavior or for any reason suspect that harassment or discrimination is occurring, are required to:

- Take all complaints or concerns of alleged or possible harassment seriously no matter how minor or who is involved.
- Report all incidents to Human Resources immediately so that a prompt investigation can occur.
- Take any appropriate action to prevent retaliation or prohibited conduct from recurring during and after any investigations or complaints.

In addition to being subject to discipline if they engage in harassing or discriminatory conduct themselves, managers and supervisors who knowingly allow or tolerate harassment, discrimination retaliation or bullying, including the failure to immediately report such misconduct to Human Resources, are in violation of this policy and may be subject to discipline, up to and including termination of employment.

Complaints of discrimination or harassment

Any colleague who believes they have experienced, witnessed, or become aware of any form of discrimination, bullying, or harassment (including sexual harassment), in violation of this policy should immediately report such conduct either verbally or in writing. Colleagues are encouraged to report their concerns to any of the following:

- A manager or supervisor
- Any Human Resources representative
- The head of Enablement
- The Chief Compliance Officer
- The General Counsel
- The head of Internal Audit
- Our Compliance Hotline

A complaint form is available from the Compliance Hotline to facilitate reporting.

The availability of this procedure does not preclude individuals who believe they are experiencing harassment from advising the offender that his or her behavior is unwelcome and that it should be discontinued.

Submitting a hotline report

The Compliance Hotline is hosted by EthicsPoint, an independent third-party provider. The hotline is an international telephone and web-based service that is available 24 hours a day, seven days per week. Translation services are available when calling the hotline.

You may submit a report to the hotline using any of the methods described below:

- Submitting a secure web form by visiting www.ihsmarkithotline.ethicspoint.com and selecting “File a Report”
- Toll-free calls by dialing 1-866-294-3538 in the United States and Canada; 0800-032-8483 in the United Kingdom; or by selecting the appropriate country telephone listed on the hotline website. Please note that international toll-free service telephone numbers are subject to change. If the number listed is not in service, please try an alternate listed number or dial the number provided at the EthicsPoint website.

You can also submit a report via email to CorporateCompliance@ihsmarkit.com. However, please note that these emails will be received by the IHS Markit Corporate Compliance team, and not EthicsPoint, if anonymity is a concern. More information can be found in the Compliance Hotline and Reporting Misconduct Policy.

Investigations

All complaints will be investigated promptly and appropriate action will be taken in a timely manner. Colleagues are required to cooperate in all investigations. While the process may vary from case to case based on the particular circumstances and the laws and regulations of the specific locality, all persons involved, including complainants, witnesses and the colleagues alleged to have committed the offending conduct will be accorded due process to protect their rights to a fair and impartial investigation. Upon receipt of a complaint, the company will conduct an immediate review of the allegations and take any necessary interim actions. The investigation may include a private interview with the colleague filing the complaint, as well as interviews with relevant witnesses and the colleague alleged to have committed the offending conduct. The investigation may also include a review of relevant documents, emails or phone records, including electronic communications. These investigations are conducted by qualified members of Human Resources and management, and will be documented as appropriate; documentation and associated documents will be kept in a secure and confidential location. Investigations will be kept confidential, to the fullest extent possible, although confidentiality cannot be guaranteed.

IHS Markit will take appropriate responsive action based on the results of the investigation and will provide feedback, to the extent appropriate, to the individual making the report and the colleague alleged to have committed the offending conduct. The company will take corrective action where any colleague is determined to have violated this policy. Anyone found to have discriminated against or harassed a colleague, applicant for employment, intern, customer, or vendor will be subject to immediate and appropriate disciplinary action, up to and including termination of employment.

Retaliation

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a claim of harassment or discrimination. The adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

IHS Markit, as well as applicable law in the jurisdictions in which we operate, prohibits retaliation against a colleague who has engaged in “protected activity.” Protection occurs when a person has:

- made a complaint of discrimination or harassment, either internally or with any anti-discrimination agency;
- testified or assisted in a proceeding involving discrimination or harassment under any anti-discrimination law;
- opposed discrimination or harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of discrimination or harassment;
- reported that another employee has been discriminated against or harassed; or
- encouraged a fellow employee to report discrimination or harassment.

Even if the alleged harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, this prohibition on retaliation is not intended to protect persons making intentionally false charges of discrimination or harassment.

Colleagues who perceive inappropriate conduct should contact any of the individuals listed in the complaint section above.

Document Management:

Policy Name	IHS Markit Policy Prohibiting Discrimination, Harassment and Retaliation
Policy Owner	Human Resources: Enablement
Applies To	All IHS Markit Colleagues
Effective Date	January 2019
Related Documents	IHS Markit Business Code of Conduct, IHS Markit Equal Employment Opportunity Policy, Compliance Hotline and Reporting Misconduct Policy
Approved By	Maggie Walker, head of Enablement
Supersedes	IHS Anti-Harassment and Anti-Discrimination Policy, Markit Harassment, Bullying and Discrimination Policy, IHS Markit Anti-Harassment and Non-Discrimination Policy 2016
Contact person for questions or policy interpretation	Maggie Walker, head of Enablement
Date Policy was last reviewed	January 2019
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