



Third Party/Vendor Code of Conduct

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Introduction

IHS Markit's reputation as a leader in information, analytics, and solutions is built on a longstanding commitment to, and foundation of, integrity, honesty, and ethical conduct. IHS Markit's success depends not only on its own conduct, but also on the actions of those with whom IHS Markit does business. For that reason, we aspire to work only with third parties who share our passion for doing business with integrity and reflect the same high ethical standards.

This Third Party/Vendor Code of Conduct ("Code") articulates the legal and ethical conduct we expect from suppliers, vendors, distributors, channel partners, agents, contractors, and all other third parties with whom we work ("Third Parties"). IHS Markit recognizes that its Third Parties operate in different legal and cultural environments throughout the world. Nevertheless, IHS Markit requires that its Third Parties comply with the fundamental legal and ethical principles described in this Code and take all reasonable steps to ensure compliance with applicable laws and regulations when conducting business with or on behalf of IHS Markit. Failure to do so may result in the termination of our relationship.

We require Third Parties to take reasonable steps to ensure that this Code is communicated throughout their organizations and made available to their employees and subcontractors who work on IHS Markit business. This Code must be understood and complied with when conducting business with or on behalf of IHS Markit, in conjunction with the standards and principles in the [IHS Markit Business Code of Conduct](#), the provisions of any contract between the Third Party and IHS Markit, and the Third Party's own comparable standards of ethical business conduct.

Legal and Regulatory Compliance

IHS Markit aims to act in compliance with all applicable laws and regulations wherever it does business globally and expects the same of its Third Parties. IHS Markit Third Parties are responsible for knowing and complying with the laws and regulations that apply to their operations and recognizing the potential dangers of non-compliance. Below are summaries of key principles and obligations to which Third Parties must always adhere when conducting business with or on behalf of IHS Markit.

Anti-Corruption

IHS Markit is committed to conducting its business free from extortion, bribery, and all unlawful, unethical, or fraudulent activity, regardless of differing local business customs or traditions. We do not tolerate bribery in any form, whether public or private. When conducting business with or on behalf of IHS Markit, Third Parties must:

- Act ethically and transparently in all business dealings.
- Never offer, give, promise, request, accept, or authorize any bribe, gift, fee, reward, advantage, or anything else of value, directly or indirectly, to any person or entity to obtain or retain business or to improperly influence any action or decision.
- Comply with all applicable local and international anti-corruption laws, regulations, treaties, and conventions, including the US Foreign Corrupt Practices Act and the UK Bribery Act.
- Never make facilitation payments, whether directly or indirectly.
- Ensure all subcontractors, referral parties, and affiliates used in connection with IHS Markit business adhere to these standards and have not engaged in, and are not likely to engage in, improper or illegal conduct.

All Third Parties doing business in connection with IHS Markit business in Japan must comply with IHS Markit's Policy Against Anti-Social Forces, available at <https://ihsmarkit.com/legal/policy-against-anti-social-forces.html>.

As appropriate, IHS Markit may require Third Parties to submit an annual review of their continuing compliance with anti-corruption laws. IHS Markit may also require Third Parties to complete training courses and annual compliance certifications as part of the company's corporate ethics and compliance program.

Financial Integrity and Accuracy of Business Records

Third Parties must maintain complete and accurate books and records relating to all IHS Markit business, together with supporting documentation, in accordance with applicable accounting principles, laws, and regulations.

Third Parties must not make any false representations in connection with any IHS Markit transactions, including misrepresentations of fact (whether written or oral), and the promotion or use of false documentation such as non-genuine customer purchase orders, fraudulent or forged contracts, or other false or inaccurate records.

Fair Dealing and Competition

Third Parties must deal fairly with customers, suppliers, competitors, the public, and all other people or entities in accordance with ethical business practices. Third Parties must never take unfair advantage of any group or individual through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. Additionally, Third Parties must *never*:

- Engage in discussions or enter into agreements that could restrict competition, such as limiting production or supply, price fixing, tying products, boycotting certain suppliers or customers, or dividing or allocating markets, territories, or customers.
- Participate in bid rigging.
- Gather information about competitors using unethical or illegal means.
- Engage in any activity that is prohibited under applicable antitrust and competition laws.

Trade Practices

IHS Markit requires its Third Parties to comply with all applicable trade laws and regulations, including obtaining proper export authorization, establishing eligibility of export recipients, and securing all required licenses and documentation.

Due to the extensive presence of US touchpoints throughout our organization, Third Parties must always also comply with US trade regulations, regardless of where in the world they are operating, when conducting IHS Markit business. This means that Third Parties may not conduct IHS Markit business with destinations subject to comprehensive embargoes (as of the date of this policy, this includes Cuba, Iran, North Korea, Syria, and the Crimea Region of Ukraine) or with persons or entities identified on any restricted party screening lists (including the US Treasury Department Office of Foreign Assets Control Specially Designated Nationals List and the US Commerce Department Bureau of Industry and Security Entity List). In addition, Third Parties may not agree to participate in boycotts that are not sanctioned by the US government (e.g., the Arab League boycott of Israel) in connection with IHS Markit business.

Insider Trading

While working with or for IHS Markit, Third Parties may become aware of non-public information about IHS Markit, other companies, or the market in general. Using non-public information to trade in

securities, or providing a family member, friend, or any other person with a "tip" about non-public information, is a violation of this Code and, if the information is deemed "material," potentially illegal. Third Parties shall ensure that non-public information entrusted to them by IHS Markit is not used for the benefit of the Third Party or any other person or entity.

Anti-Money Laundering

Third Parties must comply with anti-money laundering and anti-terrorism regulations and take the necessary steps to ensure that IHS Markit business is conducted only with reputable customers that are financed only from legitimate sources.

Privacy

IHS Markit expects its Third Parties to protect the personal information that they access, collect, receive, process, use, or retain on behalf of IHS Markit. Third Parties must always comply with applicable laws and regulations and must implement policies and controls to ensure that applicable privacy rights of individuals are respected. Third Parties should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational, and financial consequences for the Third Party, IHS Markit, and the individuals whose information is implicated.

Any Third Party that accesses, collects, processes, uses, or retains personal information at IHS Markit's request or on IHS Markit's behalf may be required to agree to certain contractual obligations to ensure compliance with IHS Markit's standards regarding the protection of personal information.

Ethical Business Practices

Conflicts of Interest

IHS Markit expects its Third Parties to recognize and avoid situations that can create an actual or apparent conflict of interest when working with or on behalf of the company. Conflicts of interest can occur if a personal, social, financial, professional, or political activity interferes or appears to interfere with (1) a Third Party's ability to perform its work with or on behalf of IHS Markit effectively and objectively, or (2) the interests of IHS Markit. For example, it is a conflict of interest for a Third Party to allow an IHS Markit employee to hold a position, provide independent consulting or services, or have a financial or business relationship with the Third Party.

Third Parties must disclose any actual or potential conflicts of interest by completing a Conflict of Interest Disclosure Form, available at www.ihsmarkitcoidisclosure.ethicspoint.com. This is a continuing obligation; if at any time during the course of a Third Party's relationship with IHS Markit an apparent or actual conflict of interest arises, or guidance is required, the Third Party must complete the Conflict of Interest Disclosure Form.

The following Third Parties are required to complete the Conflict of Interest Disclosure Form prior to commencing work on IHS Markit matters:

- (1) correspondents, channel partners, and contributors; and
- (2) contingent workers who handle sensitive proprietary, financial, and/or material non-public information.

Depending on the circumstances, Third Parties may be required to put appropriate measures in place to manage the conflict of interest.

Gifts, Meals, and Entertainment

Although the exchange of gifts, meals, and entertainment can promote successful working relationships and goodwill, it is also a common way in which conflicts of interest and bribery concerns can arise.

Third Parties must adhere to applicable laws and regulations when exchanging business courtesies and avoid even the perception of impropriety. While working with or for IHS Markit, Third Parties may only offer or accept non-cash gifts, meals, or entertainment when doing so:

- Promotes a successful working relationship and overall goodwill;
- Relates to a legitimate business interest;
- Is reasonable in value;
- Does not create an actual conflict of interest or divided loyalty;
- Occurs at an appropriate venue;
- Is not prohibited by the offeror or recipient's business practices; and
- Does not create the appearance of an improper attempt to influence a business decision.

Third Parties must obtain pre-approval from Corporate Compliance for any business courtesies offered, given, or received in connection with IHS Markit business that:

- Involve Government Personnel¹; or
- Exceed \$200 per person, per instance

Pre-approval can be requested using the IHS Markit Business Courtesies Form, available at <https://ihsmarkitbusinesscourtesies.ethicspoint.com/>.

Professional Work Environment

IHS Markit is committed to maintaining an inclusive and diverse workplace, free from acts of discrimination, harassment, retaliation and unprofessional behavior. We expect our Third Parties, while working with or for IHS Markit, and both on and off IHS Markit premises, to always treat others with respect and dignity, and contribute to a workplace that is characterized by courtesy, honesty, and inclusiveness. Third Parties are responsible for maintaining a professional and productive work environment and exercising the highest standards of ethics and professional conduct. In accordance with local law, Third Parties may be required to follow the [IHS Markit Policy Prohibiting Discrimination, Harassment and Retaliation](#) and to undergo associated training.

¹ "Government personnel" includes any elected or appointed public official in any branch of government (executive, legislative, judicial); any employee, agent, or representative of any government agency; any employee, agent, or representative of any company or organization owned or controlled, in whole or in part, by a government agency; any candidate for political office; ambassadors and representatives of foreign governments; honorary officials, such as royal family members; union officials; judges, legislators, and their staff members; and representatives and employees of political parties and public international organizations, such as the International Red Cross, United Nations, World Bank, NATO, and FIFA. Government personnel also include immediate family members of any of the individuals who fit this definition of "government personnel."

Information Security & Acceptable Use

IHS Markit supports an information security program and practices that meet recognized industry standards for information protection and expects Third Parties to do the same. Third Parties with access to information about IHS Markit or its customers and employees must comply with all laws and industry standards applicable to such data. Accordingly, Third Parties must have appropriate physical, administrative, and technical safeguards to protect data in all forms against misuse, abuse, or compromise. This means that, among other things, Third Parties must:

- Treat IHS Markit information as confidential, unless disclosure has been authorized by IHS Markit.
- Only share confidential information on a need-to-know basis for legitimate business purposes.
- Implement policies and controls to safeguard data, such as access restrictions, systems protections, and safe hardware disposal.
- Only send email concerning IHS Markit business from secured email platforms. The use of emails from free platforms, such as email addresses with Gmail, Hotmail, or Yahoo designations must be pre-approved by IHS Markit.
- Not have discussions involving confidential information related to IHS Markit business in public areas where the discussions could easily be intercepted or overheard.
- Only use IHS Markit's confidential information for the purposes agreed to by contract. Independent use of IHS Markit's data is prohibited.
- Immediately report identified privacy or security breaches or vulnerabilities to informationsecurity@ihsmarkit.com and the IHS Markit employee who manages your contract.
- Store IHS Markit information and records in a manner that ensures their usability, reliability, authenticity, and security.
- Create, retain, and dispose of IHS Markit information and records in full compliance with all applicable legal and regulatory requirements.

In accordance with local law, and as it pertains to the services for which they are engaged, Third Parties may also be required to follow certain information security requirements and undergo associated training.

Onsite Visitor Requirements

While on IHS Markit premises, Third Parties must comply with all company rules and procedures, including security measures and requests. These may include:

- Accessing only authorized areas.
- Registering with security/reception where applicable and ensuring that any identification provided, such as a visitors badge, is visible at all times.
- Promptly reporting known security violations, such as lost or missing access cards or keys, and property loss or damage.
- Complying with the [IHS Markit Workplace Health & Safety Policy](#) and all facility requirements including maintaining a substance-free and violence-free work environment.

Confidential Information & Intellectual Property

IHS Markit intellectual property and proprietary information are extremely valuable assets and must be protected. Third Parties must safeguard IHS Markit's proprietary information and intellectual property, such as trademarks, patents, copyrights, and inventions, even if public. Third Parties must

not infringe upon the intellectual property rights of other companies or violate any terms and conditions established by contract with IHS Markit.

Proprietary information is any information that is owned by IHS Markit, including information in IHS Markit databases and confidential or publicly available information, regardless of whether such information is subject to copyright, patent, or other intellectual property right protections. Examples of proprietary information include IHS Markit publications, technical or financial information relating to current or future products, services, or research, business or marketing plans or protection, personnel information, earnings and other financial data, and software.

Third Parties must return all confidential and proprietary information in their possession to IHS Markit when the contractual relationship between IHS Markit and the Third Party has terminated, unless otherwise specified by contract. The obligation to protect IHS Markit information continues even after any business relationship between IHS Markit and the Third Party ends.

Human Rights and Labor Standards

In accordance with our [Human Rights and Labor Practices Policy](#), IHS Markit is committed to compliance with the UK Modern Slavery Act, and conducting business in a manner that respects the rights and dignity of all people and supports the principles contained in the United Nations Universal Declaration of Human Rights. Third Parties must treat their employees fairly and in accordance with applicable laws and regulations regarding labor and employment, and the following principles:

- **Freely Chosen Employment & No Child Labor.** Allow for employment as an expression of free choice. Forced, involuntary, or child labor is prohibited in all circumstances.
- **Non-Discrimination & Employment Equality.** It is prohibited to engage in or support discrimination, or base employment decisions on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, veteran status, marital status, or any other basis that is protected under applicable law.
- **Freedom of Association.** Respect the legal rights of employees to join or refrain from joining worker organizations, including trade unions.
- **Workplace Health & Safety.** Conduct business operations in a safe and professional manner while performing services for IHS Markit, including taking proactive measures to eliminate workplace injuries and disease.
- **Wage & Benefits.** Provide wages, benefits, and overtime pay required by applicable laws and regulations.

Environmental Responsibility

IHS Markit is committed to environmental stewardship and expects Third Parties to maintain process that help reduce waste, improve resource efficiency, and mitigate the effects of climate change. IHS Markit expects Third Parties to safeguard the health and safety of the public and minimize adverse operational effects to communities, the environment, and natural resources when conducting business with or on behalf of IHS Markit. This includes the expectation that Third Parties employ practices that optimize waste and energy usage by taking steps to modify production, maintenance, and facility processes that improve resource efficiency and reduction.

IHS Markit expects all Third Parties to obtain, maintain, and keep current all required environmental permits (for example, discharge monitoring) and registrations, and to follow all operational and reporting requirements.

Accountability and Compliance

Every Third Party is obligated to understand these responsibilities and exercise proper judgment in compliance with this Code. IHS Markit reserves the right, as a condition of doing business, to monitor compliance with the Code through questionnaires, certifications, or other means deemed appropriate.

Third Parties must immediately notify IHS Markit upon becoming aware of any negative or adverse publicity concerning the Third Party's business or any product or service the Third Party provides to IHS Markit, or any event or circumstance related to the Third Party or its business that could be reasonably expected to cause negative or other adverse publicity concerning IHS Markit.

Violations of this Code will not be tolerated. Any Third Party that acts in contravention of this Code risks immediate termination of all existing and future IHS Markit business.

Report Concerns

Subject to local laws and any legal restrictions, IHS Markit requires that Third Parties report any violation of this Code or applicable law in connection with IHS Markit business to the IHS Markit Compliance Hotline at www.ihsmarkithotline.ethicspoint.com. The Hotline is available in a variety of different languages, 24 hours a day, 7 days a week. When allowed by local law, calls to the IHS Markit Compliance Hotline may be placed anonymously. IHS Markit prohibits retaliation for good faith reports of suspected misconduct. For further information, please see IHS Markit's Compliance Hotline and Reporting Misconduct Policy, accessible at <https://investor.ihsmarkit.com/corporate-governance>.

Legal Notice: IHS Markit reserves the right to revise this Third Party/Vendor Code of Conduct ("Code of Conduct") at any time. The IHS Markit Third Party/Vendor Code of Conduct is not a contract. It does not confer rights on anyone, including without limitation, Third Parties or their agents or employees, and imposes no obligations on IHS Markit. If an inconsistency arises between this Code of Conduct and the provisions of any written agreement between IHS Markit and Third Party, the terms of the written agreement prevail except to the extent they are contrary to law.