



IHS Markit®

Policy prohibiting discrimination, harassment and retaliation

30 August 2021

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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 individuals 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 and bullying) and retaliation in the workplace.

Scope

This policy applies globally to all employees, applicants for employment, interns, work experience participants, contingent workers (such as consultants and contractors) and third parties of IHS Markit, its subsidiaries and affiliates ("IHS Markit" or the "company"). 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 individuals are traveling for business or at company related events or parties. Inappropriate content contained in calls, texts, emails, and social media usage can constitute unlawful workplace harassment, discrimination, bullying 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 and bullying) and retaliation 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 and diverse workplace, free from acts of discrimination and harassment, IHS Markit is committed to making all employment and service decisions based on job-related qualifications and promoting an environment of equality and respect.

Acts of discrimination and harassment based on a person's race, color, age, disability, medical condition, physical appearance, national origin, ancestry, alienage or citizenship status, pregnancy (including reproductive health choices), ethnicity, religion/creed, genetic information, sex, gender (including gender identity, gender expression or status as a transgender person or person in gender transition), sexual orientation, military or veteran status, marital or familial/parental status, status as a victim of domestic violence, stalking or sex offenses, or any other category protected by applicable law ("protected characteristics") are strictly prohibited.

Harassment

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 can include, but are not limited to: threatening, intimidating or hostile acts, offensive oral or written comments, jokes, slurs, profanity, 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 or unfair treatment aimed at a person in the same workplace that, takes advantage of one’s superior position (or assertion of superiority) and goes beyond the appropriate scope of duties. Bullying can result in physical or psychological pain on the person the behavior is aimed at and negatively impact the working environment.

Examples of power harassment or bullying can include, but are not limited to:

- spreading rumors or insults about someone,
- regularly picking on, demeaning or undermining someone, or
- unreasonably denying or preventing someone’s professional development or career progression opportunities.

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 sexual orientation, gender, self-identified or perceived sex, gender (including gender expression, gender identity and the status of being transgender or a person in gender transition). 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 or gender 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 or gender 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 employees and non-employees, such as vendors, applicants, customers or guests.

Reporting concerns

Any individual who believes they have experienced, witnessed, or become aware of any form of discrimination, harassment (including sexual harassment and bullying) or retaliation in violation of this policy should immediately report such conduct either verbally or in writing. Employees 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 head of internal audit
- The general counsel
- The chief people officer
- The compliance hotline

Contingent workers and third parties are also encouraged to reach out to their IHS Markit business line contact or the compliance hotline to report concerns.

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 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 Compliance Hotline 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 an independent third-party provider, if anonymity is a concern.

Investigations

All complaints will be investigated promptly, and appropriate action will be taken in a timely manner. Individuals 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 individuals 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 individual alleged to have committed the offending conduct. The company will take corrective action where any individual is determined to have violated this policy. Anyone found to have discriminated against or harassed an employee, applicant for employment, intern, customer, or vendor will be subject to immediate and appropriate disciplinary action, up to and including termination of employment or services.

Retaliation

Unlawful retaliation can be any action that could discourage individuals 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 an individual 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.

Anyone who perceives inappropriate conduct should reach out to any of the contacts listed in the reporting section above.

Accountability

All individuals working for and with IHS Markit 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 individual who engages in discrimination, harassment, retaliation or bullying will be subject to discipline, up to and including termination of employment or services.

Responsibility

Everyone deserves to feel comfortable while performing work and express themselves freely and authentically; treating our coworkers, customers, vendors and people we work with respectfully and equally is everyone's responsibility. In addition to adhering to this policy some proactive actions you can take are:

- Communicate clearly and effectively, be conscious of the impact of every word you use
- Be aware of the potential influence of bias and unconscious bias, both your own and that of others
- Listen to feedback from others and adjust behaviors accordingly
- Use inclusive phrases and pronouns and pay attention to how others identify themselves
- Speak up and report any inappropriate behavior - witnesses and bystanders who take action are an important part of improving our work environment

Manager Responsibility

Managers and supervisors must act expeditiously and fairly when they have any knowledge of harassment, discrimination or retaliation 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 discrimination, harassment or retaliation seriously no matter how minor or who is involved
- Report all incidents to Human Resources immediately or file a Manager Hotline Incident Report Form a 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, are in violation of this policy and may be subject to discipline, up to and including termination of employment.

Document Management

Policy Name	IHS Markit Policy Prohibiting Discrimination, Harassment and Retaliation
Policy Owner	Human Resources: Enablement
Applies To	All IHS Markit employees, contingent workers and third parties
Original Effective Date	01 January 2019
Related Documents	IHS Markit Business Code of Conduct IHS Markit Code of Conduct for Conferences & Events IHS Markit Third Party / Vendor Code of Conduct
Approved By	SVP, Global Human Resources Enablement
Supersedes	NA
Contact person for questions or policy interpretation	CorporateCompliance@ihsmarkit.com EmployeeRelations@ihsmarkit.com
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