



IHS Markit™

Anti-Bribery & Anti-Corruption Statement

Introduction

IHS Markit's corporate culture is built on our six core values: accountability, customer focus, inclusiveness, innovation, integrity, and partnership. Consistent with these values, we recognize that there is no right way to do a wrong thing, and that we must always employ the highest ethical standards in every action we take with our customers, colleagues, and all others with whom we interact.

IHS Markit is committed to maintaining high standards of business ethics and to complying with the law in the conduct of its business operations worldwide. Our Business Code of Conduct, Anti-Corruption Policy, Business Courtesies Policy, and supporting documents provide guidance on how to conduct business in a fair, ethical, and legal manner. All colleagues, officers and directors of IHS Markit, and its subsidiaries and affiliates, and certain third parties acting on IHS Markit's behalf are required to: read, understand, and comply with the spirit and letter of these documents; undergo training and attestations as periodically required; recognize and report violations; and seek guidance from Corporate Compliance as needed.

Policy

IHS Markit does not tolerate any form of bribery or corruption, whether direct or indirect, by or on behalf of its employees, officers, directors, agents, consultants, or any other persons or companies acting for IHS Markit or on its behalf.

As a global company, IHS Markit complies with laws throughout the world combating bribery and corruption, including the Foreign Corrupt Practices Act of 1977 (the "FCPA") and the U.K.'s Bribery Act 2010 (the "U.K. Bribery Act"). The FCPA is a U.S. law that prohibits companies with U.S.-based branches or presence from promising, offering or giving money or anything of value, directly through its employees or indirectly through agents or intermediaries, to foreign officials to induce that official to violate his/her lawful duty, so that the company or another party can obtain, retain or conduct business. Under the FCPA, a U.S.-based company can be held liable for any illegal payments to foreign officials authorized by employees or agents operating entirely outside the U.S. and without any involvement by personnel located within the U.S.

The U.K. Bribery Act has a wider scope than the FCPA. The law applies to any company that does business in the United Kingdom, such as IHS Markit, and prohibits bribery in the private sector, as well as the public sector, no matter where in the world the bribery occurs.

Key Points

- A bribe of any value is illegal and is prohibited by IHS Markit, regardless of whether it is paid to government personnel or a private person.
- Bribes can include, without limitation, money, gifts, favors, charitable or political contributions, hospitality, promises of employment, and reimbursement of expenses.
- IHS Markit prohibits kickbacks and facilitation payments, *without exception*.
- IHS Markit requires accurate books and records in all its dealings, not just the offer and receipt of business courtesies.

Consequences of Bribery and Corruption

Bribery is a criminal offense. Failure to comply with applicable anti-corruption laws may result in severe penalties for IHS Markit, including fines, exclusion from government contracting, forfeiture of property, legal action by competitors, reputational damage, and loss of business. Colleagues who violate IHS Markit's Anti-Corruption Policy will be subject to discipline, up to and including termination of employment. Individuals who violate the FCPA, the U.K. Bribery Act, or other anti-bribery laws, regulations or international conventions may be personally liable and subject to fines and/or imprisonment.

Obligations

As explained further in IHS Markit's Anti-Corruption and Business Courtesies Policies, colleagues and third parties acting on IHS Markit's behalf are required to comply with the following obligations:

- Do not accept, offer, promise, or pay a bribe
- Use business courtesies for a legitimate business purpose
- Obtain pre-approval before offering or providing a business courtesy to government personnel
- Obtain pre-approval for business courtesies exceeding US\$200 to private (non-government) recipients
- Obtain pre-approval for lodging, travel, and per diems
- Ensure charitable contributions meet the [IHS Markit Philanthropy Policy](#) requirements
- Do not make or offer to make a facilitation payment
- Payments must be made only to identified and approved payees
- Maintain accurate books and records

Reporting and Non-Retaliation

The effectiveness of IHS Markit's Anti-Corruption program depends on on all parties playing their part in helping to prevent bribery. Colleagues and third parties are therefore encouraged to report any suspected bribery or unethical or illegal conduct in accordance with the procedures set out in our [Compliance Hotline and Reporting Misconduct Policy](#). Reports will be treated as confidential to the extent allowed by law. IHS Markit prohibits retaliation for good faith reports of suspected misconduct.