



IHS Markit™

Vendor Code of Conduct

January 2019

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Vendor Code of Conduct

The following guidelines set forth the framework of acceptable conduct IHS Markit expects from its suppliers, vendors, and all other third-party companies that comprise the IHS Markit supply chain ("Vendor(s)").

These guidelines are based on IHS Markit's commitment to integrity. We regard our Vendor base as a critical and necessary extension of our operations and future success and we thank you for continuing to make compliance and integrity a top priority as you work with IHS.

All work performed for IHS Markit by a Vendor must be in full compliance with this IHS Markit Vendor Code of Conduct (or "Vendor Code") and all applicable laws, rules and regulations.

In particular, IHS Markit expects its Vendors to:

- Extend the principle of fair and honest dealings to all others with whom the Vendor does business, including employees, sub-contractors and other third parties;
- To the extent reasonably practicable Implement the standards within the Vendor Code within the Vendor's own supply chain; and
- Comply with the specific requirements set out within this Vendor Code.

Failure to comply with the Vendor Code during the course of business with IHS Markit may lead to your disqualification as an approved Vendor.

Vendor Compliance Obligations

Anti-Corruption

It is IHS Markit's policy to conduct business transactions with integrity and to maintain a culture of honesty, regardless of differing local business customs and traditions. IHS Markit expects integrity in all business dealings by its Vendors to avoid any improper advantage or the appearance of questionable conduct. The offering and acceptance of kickbacks, bribes and other illegal payments subverts the very essence of competition and is strictly prohibited. This includes gratuities to individuals with the purpose of obtaining or retaining business or unduly influencing a business decision.

Conflicts of Interest

Vendors must avoid any situation where its interests (financial or otherwise) conflict with the duties that it owes to IHS Markit.

Without limitation a conflict may arise when (i) a Vendor employs or is partially or fully controlled by an IHS Markit employee or his or her family member, or (ii) when a Vendor, its employees and its employees' family members receive improper benefits through the Vendor's relationship with IHS Markit

No Vendor is permitted to allow other interests to conflict with acting in the best interests of IHS Markit.

Compliance with Laws

IHS Markit intends to conduct its business in compliance with all applicable laws and regulations, wherever IHS Markit conducts business around the world. Vendor has the responsibility to acquire appropriate knowledge of and comply with the laws and regulations that apply to their services and their areas of responsibility and to recognize

Confidential Information

IHS Markit confidential information may only be used as required in the ordinary course of performing Vendor's for IHS Markit. Vendor may not disclose any IHS Markit confidential information to any person except those with a "need to know." Confidential information includes any information made available to Vendor and any information relating to IHS Markit's and its clients' business that is acquired or accessed while performing its duties for IHS Markit.

Data Privacy

All Vendors are expected to respect applicable Data privacy laws and regulations and ensure that personal data processed on behalf of IHS Markit is done by implementing appropriate technical and organizational measures to protect personal data.

This includes protecting personal data from accidental or unlawful destruction, loss or alteration, unauthorized disclosure or access, in particular, where the processing involves the transmission of data over a network, and against all other unlawful forms of processing.

Employment Practices

All Vendors are expected to treat those it encounters in the workplace with respect, fairness and dignity.

In particular, Vendors are expected to extend equal opportunity, fair treatment and a harassment-free work environment to all employees, consultants and other business associates without regard to race, color, religion, national origin, gender (including pregnancy), sexual orientation, age, disability, veteran status or other protected characteristics.

Insider Trading

It is IHS Markit's policy to hold in confidence any non-public or proprietary information that may be entrusted to us, which we may develop, or to which we may have access in the course of servicing our clients. Securities regulations and IHS Markit's [Insider Trading Policy](#) prohibits the unauthorized disclosure of any such non-public information acquired as a result of a Vendor's relationship with IHS Markit as well as the misuse of any material non-public information in securities trading.

Prohibition of Solicitation

Vendors are prohibited from soliciting for employment for themselves or any third parties and from soliciting business from, enticing away from, accepting orders involving or otherwise interfering with the relationship of IHS Markit with any client or prospective client.

Environmental Compliance

All Vendors must recognize that environmental responsibility is integral to producing world-class products today, and for the long term. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

IHS Markit expects all Vendors to obtain, maintain and keep current all required environmental permits (for example, discharge monitoring) and registrations, and to follow all operational and reporting requirements. Waste of all types, including water and energy, is to be reduced or eliminated at the source or by practices such as modifying production, maintenance, and facility processes; materials substitution; conservation;

recycling; and reusing materials.

Fair Competition

IHS Markit expects all Vendors to compete fairly and ethically for all business opportunities. Vendor's employees involved in the sale or licensing of products and services and the negotiation of agreements and contracts to IHS Markit must ensure that all statements, communications and representations to IHS Markit are accurate and truthful.

Health and Safety

IHS Markit expects Vendor to conduct their business operations in a safe and professional manner and to abide by all IHS Markit health and safety policies while performing services at IHS Markit facilities.

Human Rights

Vendor must be committed to uphold the human rights of workers and to treat them with dignity and respect including without limitation the prohibition of slavery and human trafficking. All Vendors must in addition comply with the IHS Markit Human Rights and Labour Protection Policy.

Reporting Violations

Subject to local laws and any legal restrictions applicable to such reporting, each Vendor is expected to promptly inform IHS Markit of any Vendor Code violation involving or affecting IHS Markit whether or not the concern involves the reporting Vendor, as soon as the Vendor has knowledge of such concern.

Vendor shall report violations of this Code of Conduct through the IHS Markit Compliance Hotline: www.ihsmarkithotline.ethicspoint.com. This hotline allows for reporting in a variety of languages through a secure web-based reporting tool or by calling +1-866-294-3538. Reports will be treated as confidential to the extent allowed by law.

IHS Markit forbids retaliation against any person reporting a concern in good faith.

Policy Name	Vendor Code of Conduct
Policy Owner	Supply Management
Applies To	All IHS Markit Vendors
Effective Date	January 2019
Related Documents	Human Rights and Labour Protection Policy
Approved By	Grant Nicholson
Supersedes	IHS Supplier Code of Conduct
Contact person for questions or policy interpretation	Kevin Forant
Date Policy was last reviewed	January 2, 2019