

GARTNER AUSTRALASIA PTY LTD ABN 69 003 708 601 MODERN SLAVERY STATEMENT

Introduction and single reporting entity

This Modern Slavery Statement (**Statement**) has been published pursuant to section 13 and 16 of the *Modern Slavery Act 2018* (Cth) (**Act**) for Gartner Australasia Pty Limited ABN 69 003 708 601 (**Gartner Australasia**).

Gartner Australasia has a zero-tolerance approach to modern slavery and human trafficking, and we are fully committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to help ensure that slavery and human trafficking are not taking place anywhere in our business. Gartner Australasia recognises that we have a responsibility to be aware of the risks in our business, no matter how remote the possibility, and in our wider supply chain.

Structure, operations, and supply chains

Structure - About Gartner Australasia

Gartner Australasia, a proprietary limited company domiciled in Australia is part of the Gartner group of companies sitting under our ultimate parent entity, Gartner Inc. (**Gartner, Inc.**), which is the world's leading research and advisory company, and listed on the New York Stock Exchange.

At Gartner, we deliver actionable, objective insight to executives and their teams. Our expert guidance and tools enable faster, smarter decisions and stronger performance on an organisation's mission critical priorities. We are the valuable partner to more than 15,000 client enterprises in more than 100 countries.

Gartner Australasia does not have any entities it owns or controls, however, we also conduct business in New Zealand as an overseas registered branch with the Gartner Office located in New Zealand. Gartner Australasia provides all services provided by Gartner, Inc., except for Consulting Services.

Since the inception of Gartner Australasia in 1989, Gartner Australasia's primary focus is to serve its clients and business partners in Australia and New Zealand. In Australia we have offices in Canberra, Melbourne and Sydney, a dedicated serviced office space and coworking office space membership in Brisbane and coworking office space in Perth.



Employees

Gartner Australasia had 428 associates as of 31 December 2022 in Australia and is primarily administered from its head office in Sydney, Australia.

Gartner Australasia Operations

Gartner Australasia's Services can be broken down into the following areas:

1. **Research and Advisory Services** – Both for technology and non-technology areas. Services are provided either via client access to Gartner research reports or calls with analyst researchers. Analysts are based both in Australia as well as other parts of Asia, US and their back-office staff in India.
2. **CFC** – CFC is an Executive Level, high-touch contract optimization service for end user clients. A form of risk reward cost optimisation consulting carried out by associates in the UK office for a small number of clients in Australia.
3. **Conferences** - Gartner Australasia runs technology conferences and business forums for its clients in Australia and New Zealand. During these conferences, Gartner Australasia engages (third party) venues, hotels and suppliers for services ranging from hospitality services to AV and security.

Gartner Australasia Supply Chain

Gartner Australasia partners with a variety of small to medium size suppliers for most of our local requirements, and with multi-national suppliers for items such as technology, infrastructure and real estate.

Most of the goods and services Gartner Australasia procures come from suppliers and contractors that are selected and onboarded by our Gartner, Inc. global procurement team which comprises of a 'Source to Contract' team and 'Procure to Pay' team. Given that we leverage a global supply chain to address most of our needs, Gartner Australasia has never been made aware of any activities involving either us or our supply chain that would give concern in relation to modern slavery. If any such incident was highlighted to Gartner Australasia, we would promptly take action in accordance with our legal and moral obligations.



There are some local suppliers we work with to support local operations. Gartner Australasia's main categories of local procurement include:

- Property.
- Facilities Services.
- Office supplies and consumables.
- Short-term contracts.
- Business travel.
- Electronics and technology.
- Professional Services.

Risks of modern slavery practices in Gartner Australasia's operations and supply chains

With the exception of a portion of the internal IT helpdesk services and third-party conference support providers, Gartner Australasia's services are provided in-house through Gartner associates directly employed by Gartner and are not outsourced or procured elsewhere. This includes delivery of Gartner Research and Advisory Services. Gartner Australasia does not sell or provide its services via agents or resellers. These factors significantly limit the risk exposure to Gartner Australasia under the Act, due to the level of control maintained over our operations and services.

We consider the risk of modern slavery practices existing within Gartner Australasia's business operations to be low because our services are generally not reliant on supplies from third parties. However, we acknowledge that the risks of modern slavery practices may be heightened in some parts of Gartner Australasia's supply chain as a result of the geographical location of some suppliers, or due to the way the products are produced, for example, some products (such as electronic goods and their component parts) that Gartner procures for its business operations are made in countries where there may be a risk of labour exploitation.

Actions taken to assess and address modern slavery risks

Gartner Australasia is committed to taking action to assess and address modern slavery risks. Below are the steps we have taken to better understand modern slavery risks and help us develop a sustainable plan for future years to continue our commitment to eliminating modern slavery.



Understanding modern slavery

During this reporting period, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. At this early stage, we have commenced assessing what procedures we already have in place to identify and address modern slavery.

Gartner Policies

Gartner has a number of policies to ensure that we are conducting business in an ethical and transparent manner. These policies are applicable and adopted by Gartner Australasia and include:

1. **Recruitment policies.** Gartner Australasia maintains robust recruitment policies, including conducting eligibility to work in Australia checks as well as background checks with respect to police reports, education and prior employment for all associates to safeguard against human trafficking or individuals being forced to work against their will. We use our internal recruiters to source labour and, on the rare occasion when we use an external agency, we verify the practices of any new agency before accepting workers from that agency.
2. **Gartner helpline.** Gartner Australasia associates have access to a global helpline which services as a "Hotline" administered by an independent third party 24 hours a day, 7 days a week. All concerns regarding inappropriate behaviour, policy violations or violations of the law may be raised anonymously, where permitted by law, in many languages, on this helpline.
3. **Global Code of Conduct.** Gartner has a global Code of Conduct. This Code explains the manner in which Gartner behaves as an organisation and how we expect our associates to act.
4. **Global Human Rights Policy.** This policy underlines Gartner's commitment to human rights in the workplace. This commitment includes respecting the dignity and worth of all individuals, encouraging all associates to reach their full potential and providing equal opportunities. The policy also sets out our commitment to respect international human rights principles outlined in the United Nations Global Compact and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.
5. **Global Supplier Code of Conduct.** Gartner Australasia endeavours to choose reputable suppliers which conduct their business in an ethical and honest manner, and in compliance with all applicable laws and regulations including the Act. Gartner



Australasia requires its suppliers agree to our global Supplier Code of Conduct or demonstrate that the supplier has a similar code.

These policies guide our behaviours and actions such as with respect to what is illegal, unethical or that breaches human rights. All associates are required to take regular training on these policies and confirm compliance with the Gartner Code of Conduct as a newly hired associate and annually thereafter.

Supplier Code of Conduct and Responsible Sourcing contract clause

As noted above, Gartner Australasia requires its suppliers (including the supplier's employees, representatives and subcontractors) to comply with our Supplier Code of Conduct. The Supplier Code requires suppliers to commit to conducting business in an ethical and honest manner and in compliance with all applicable laws and regulations, while furthering values of diversity, inclusion, respect and integrity. The Supplier Code strictly forbids all forms of slave labour. This is a part of our supplier due diligence screening process and is used to ensure that our suppliers have the same values and approach as Gartner Australasia.

We have started the process of updating our Supplier Code of Conduct to include a statement in relation to modern slavery where we describe a standard of practice that promotes adherence to Gartner's values with respect to respecting human rights. This update to our Supplier Code of Conduct will apply globally across Gartner Inc. when the revised version of our Supplier Code of Conduct is endorsed for publication. We also updated the responsible sourcing clause in our standard venue agreements to strengthen supplier obligations in relation to modern slavery.

Coupa

Gartner Australasia has recently implemented a new spend management platform called Coupa. Coupa is the main platform used across all offices for supplier onboarding and requisitioning of goods and services procured from third party suppliers, and one of its benefits is the supplier risk management process, including a risk check at the time the supplier is set up and continuous monitoring using a risk-based approach. The risk check involves all suppliers that are onboarded to Coupa being run through Dow Jones and any matches reviewed.



Assessing the effectiveness of our actions

During this reporting period, Gartner Australasia's focus was to gain a better understanding of modern slavery risks and whether such risks are present in our operations and supply chains. At this early stage, we are unable to adequately assess the effectiveness of measures we have undertaken. However, we have commenced and will continue to work on developing actions to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

Modern Slavery Road Map

This marks the first Statement for Gartner Australasia. In 2022 we focused on understanding of modern slavery risks and whether such risks are present in our operations and supply chains.

Over the next twelve months, specific focus will be placed on continuing to enhance our modern slavery risk identification and management, education, and awareness in Gartner Australasia together with appropriate analytics. We plan to carry out the following actions:

- Prepare a modern slavery action plan to assist Gartner Australasia in addressing, assessing and combating modern slavery.
- Bring together key areas of our business to help build on our understanding of modern slavery practices and risks and consider collectively the actions needed to respond to those risks.
- Onboarding suppliers across the Gartner Inc network onto Coupa.
- Consider the feasibility of additional due diligence review measures such as supplier questionnaires, adherence to a modern slavery statement or a contractual clause in our Gartner Australasia contracts to target modern slavery. The first tranche will focus on certain categories of suppliers.

Any other relevant information

Other reporting obligations

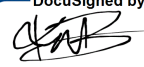
Gartner, Inc. has reported under the United Kingdom *Modern Slavery Act 2015*. We consider the implementation of these reporting regimes as important developments in combatting modern slavery and human trafficking around the world.



Approval

This Statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes Gartner Australasia's statement for the reporting period **1 January 2022 to 31 December 2022**.

This Statement is signed by Karoline Elizabeth Bonacci in her role as director of Gartner Australasia Pty Limited, and was approved by the Board of Directors of Gartner on 4 May 2023 in compliance with section 13 of the Act. It will be reviewed and updated annually.

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Karoline Elizabeth Bonacci
Director of Gartner Australasia Pty Limited
4 May 2023