

**GARTNER AUSTRALASIA PTY LTD ABN 69 003 708 601**  
**MODERN SLAVERY STATEMENT**  
**For the reporting period 1 January 2023 to 31 December 2023**

## **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 and an objective resource for more than~ 15,000 client enterprises in more than 90 countries and territories - across all major functions, in every industry and enterprise size.

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 446 associates as of 31 December 2023 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 in Australia as well as other parts of Asia, US and Europe.
2. **Computer Financial Consultants (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. In addition, Gartner's Supplier Diversity program ensures an opportunity to include suppliers from traditionally underrepresented communities to be part of our greater supply chain.

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 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 the legal obligations and our Code of Conduct.



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.

Gartner offers all internal and external stakeholders multiple methods to report possible misconduct or concerns, including human rights issues. Associates can raise their concerns to their manager, HR partner or Legal & Compliance. In addition, possible misconduct or concerns may be submitted 24/7 telephonically or via the web anonymously (where legally permitted) through our third-party Gartner Ethics Helpline.



## **Actions taken to assess and address modern slavery risks**

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

### **Assessing modern slavery risks**

During this reporting period, to review our relationship with our suppliers, we created a questionnaire focused on learning more about our suppliers' operations. The questionnaire is based on guidance by the Federal Government and is designed to better understand policies and practices of our suppliers. The purpose of this questionnaire is not only to help identify the modern slavery risks with our suppliers but also to drive positive change to mitigate those risks.

### **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. **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 to agree to our global Supplier Code of Conduct or demonstrate that the supplier has a similar code. Gartner's Supplier Code of Conduct clearly mentions that our suppliers must comply with all applicable modern slavery laws, statutes, regulations and codes in force and take reasonable steps to ensure that there is no modern slavery or human trafficking in its or its subcontractors' supply chains or business operations.
2. **Gartner helpline.** Gartner Australasia associates have access to a global helpline which serves 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. **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.

These policies guide our conduct 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.

Gartner conducts sanction screening on all suppliers and additional due diligence as appropriate to ensure that suppliers meet Gartner's standards. Sanction screening involves checking the names of actual and potential suppliers against watchlists to ensure that Gartner does not do business with any entity either in a sanctioned country or on a list of entities with which Gartner is legally prohibited from doing business. We also do sanction screenings on other third parties, including clients.



## **Corporate Responsibility**

In addition to relevant policies such as those listed above, each year we publish our Corporate Responsibility Report. The report underlines Gartner's commitment to uphold the highest ethical standards throughout all our global operations. It measures our performance against key Environmental, Social and Governance ("ESG") metrics referencing leading reporting frameworks. These metrics include our commitment to both human rights and responsible sourcing. We have established a Corporate Responsibility Executive Council to oversee all corporate responsibility programs, monitor the environmental impact of Gartner operations and provide guidance to the Operating Committee (our executive leadership team) on ESG issues. Our commitment to continuous improvement in our approach to corporate responsibility remains steadfast.

## **Coupa**

Gartner Australasia has a 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. We are implementing steps to ensure that our suppliers commit to conducting business in compliance with all applicable modern slavery laws and regulations,

## **Assessing the effectiveness of our actions**

During this reporting period, Gartner Australasia has undertaken procedures outlined above and has no reason to believe that these actions are not effective. We also ascertained that modern slavery risks in our operations and supply chains are low. Nonetheless, we are committed to implementing appropriate steps to ensure we uphold the principles of the law. We will continue to assess and address modern slavery risks in our operations and supply chains.



## Ongoing commitment to combat modern slavery risks

In our first Statement for Gartner Australasia in 2022, our focus was on understanding modern slavery risks and whether such risks are present in our operations and supply chains. In 2023, we took the following steps to ensure we uphold the principles of the Modern Slavery Regulations. In 2024, we are continuing to enhance our modern slavery risk identification and management, education, and awareness in Gartner Australasia.

## 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 combating 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 2023 to 31 December 2023**.

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 27 June 2024 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

27 June 2024