

# Corporate Forms and Policies

## Business and Personal Conduct

## European Union Whistleblower Policy

Geographic Coverage	European Union
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## Policy Philosophy & Purpose

Gartner is committed to a culture of compliance and to promoting the highest standards of integrity and ethical behaviour. Any suspected wrongdoing must be reported as soon as possible.

This European Union Whistleblower Policy (“**Policy**”) sets forth the mechanisms for reporting complaints and concerns, describes how reports are treated and investigated, and makes clear that Gartner prohibits retaliation when a report is made in good faith.

Reports can also be made under local reporting arrangements, as set out in the Country Specific Exhibits (“**Exhibits**”).

## Scope and Applicability

This Policy applies to Gartner employees (“Gartner Associates”) employed in the European Union (“EU”) and former Gartner Associates, consultants, contractors, agency workers, interns, officers, directors, shareholders and volunteers working for Gartner in the EU (“**Reporters**”).

# Policy Detail

## What is whistleblowing?

Whistleblowing is the reporting of complaints and concerns related to the following topics:

- Financial services, products and markets, and prevention of money laundering and terrorist financing;
- Public procurement and consumer protection;
- Public health;
- Product, food or transport safety or compliance;
- Protection of the environment or health and safety concerns;
- Protection of privacy and personal data, and security of network and information systems;
- Breaches of legislation (which may include local laws or if applicable, EU legislation) in respect of any of the above issues; or
- Concealment of any of the above issues.

(Collectively the “**Whistleblower Reporting Matters**”). The scope of what constitutes whistleblowing varies according to jurisdiction and, as such, additional types of wrongdoing may qualify and this Policy is not intended to exclude such matters. Similarly, this Policy and the Exhibits do not confer any additional rights to associates beyond their existing statutory rights under their relevant national law. Please refer to the [Exhibits](#) for further details, as appropriate.

## When to make a Whistleblower Report

This Policy applies to Reporters who have a genuine concern, based on reasonable grounds, that wrongdoing is taking place or is likely to take place in the workplace. In general, this Policy is not applicable to complaints about issues concerning contract terms or working relationships with other Gartner associates. Personal concerns should be addressed using the options in the [Speak Up Resource Center](#) or local grievance procedure, if applicable.

# EU Whistleblower Procedure

## Reporting Internally to Gartner

A whistleblower report may be made in the following ways:

- Confidentially and anonymously (where permitted by local law) via the [Ethics Helpline](#);
- In accordance with any local reporting arrangements set out in the relevant Exhibit; e.g., associates may have the opportunity to report to a local dedicated contact;
- Your manager or any other manager in your Business Unit;
- Human Resources Partner; and
- [Legal & Compliance](#)

Through the above reporting options, Reporters may make reports orally or in writing. Reporters can request a physical meeting and this will be set up within a reasonable timeframe.

The Ethics Helpline is run by an independent third party providing a confidential way for Reporters to make a report.

## External Reporting

While we encourage Reporters to raise any concern about the Whistleblower Reporting Matters internally, in some jurisdictions, Reporters may be permitted to make an external report without first raising matters internally. Further details on external reporting, if applicable, can be found in the Exhibits to this Policy.

## Treatment of Whistleblower Reports & Confidentiality

Gartner has appointed an independent and impartial function within the Legal and Compliance Department to act as the unit authorised to receive internal reports (“Designated Team”). When a report is received, the Designated Team will evaluate whether it relates to one of the Whistleblower Reporting Matters. If the report does not, it will not be handled pursuant to this Policy. However, the report will nonetheless be evaluated and investigated where appropriate.

Matters subject to this Policy will be investigated and treated confidentially to the extent possible. If it is deemed necessary, assistance may be sought from other teams, including (without limitation): HR, Employment Law, Compliance and Data Protection, Commercial Legal, Internal Audit, Ombuds, in investigating and resolving any report. It may also be deemed necessary to engage outside auditors, outside counsel, or other external parties to assist in the investigation.

Anonymous reporting will be offered, as allowable by local law. Completely anonymous disclosures are by their nature more difficult to investigate. If Reporters want to raise a concern confidentially, we will make every effort to keep the Reporter's identity confidential and only reveal it where necessary to those involved in investigating the concerns. If permitted by local legislation, Gartner will reveal a Reporter's identity where consent has been obtained, or in cases where follow-up measures are necessary, or a legal obligation exists, including where disclosure to public bodies or authorities is necessary.

### **Acknowledging Receipt of a Whistleblower Report**

The report will be acknowledged within 7 calendar days of receipt. If not submitted anonymously, Reporters will be informed of the investigation outcome within 3 months of this acknowledgment.

### **External Reporting**

We encourage Reporters to raise any concern about Whistleblower Reporting Matters internally to allow us to investigate and remediate the issue. In some jurisdictions, Reporters may be permitted to make an external report through country specific reporting channels as well. Further details on external reporting, if applicable, can be found in the Exhibits to this Policy.

### **Anti-Retaliation**

There are certain categories of Reporters who are given legal status as whistleblowers and are protected by law from retaliation. Note that Gartner will not tolerate retaliation against anyone, whether protected by law or not, for raising concerns in good faith regarding a Whistleblower Reporting Matter, even if they turn out to be mistaken. If a whistleblower is threatened or retaliated against in any way, such conduct will be subject to disciplinary action, up to and including termination of employment in accordance with applicable local law.

However, if a whistleblower has made false allegations in bad faith, the whistleblower may be subject to disciplinary action in accordance with applicable local law.

### **Retention of Records**

Gartner will retain all records associated with a Whistleblower Reporting Matter in accordance with our legal and regulatory obligations and record retention policies.

# Further Information

## Country-Specific Exhibits

This Policy must be read together with the relevant country-specific Exhibits, where they exist. Those country-specific exhibits are attached hereto as exhibits. If there is a conflict between this Policy and the exhibits, the latter will prevail.

### Exhibits:

[Belgium](#)

[Denmark](#)

[Finland](#)

[France](#)

[Germany](#)

[Ireland](#)

[Italy](#)

[The Netherlands](#)

[Spain](#)

[Sweden](#)

## Revision History

Published Date	Reason for Revision
16-Jul-2025	New European Union Whistleblower Policy created.
06-Aug-2025	Updated L&C links to direct associates to the Legal front door.
08-Oct-2025	Updated the external reporting channels for Gartner Spain
16-Oct-2025	Clarified the report acknowledgment receipt timeline.
21-Nov-2025	Removed the internal use only restriction and updated country-specific internal reporting email addresses.

# Gartner Belgium BV

## Scope and Applicability

This document supplements the EU Whistleblower Policy and is implemented by Gartner Belgium BV.

This Exhibit applies to Gartner Associates employed in Gartner Belgium BV and former Gartner Associates, consultants, contractors, agency workers, interns, officers, directors, shareholders, partners and holders of voting rights in the general meeting of the entity and volunteers working for Gartner Belgium BV ("**Reporters**").

## What is whistleblowing?

In addition to the Whistleblower Reporting Matters detailed in the EU Whistleblower Policy, according to local law, a 'Whistleblower Reporting Matter' is also:

- combating tax fraud and/or social fraud,
- breaches to directly applicable legal or regulatory EU legislation,
- as well as any violation of provisions adopted in implementation of the aforementioned EU legislation.

## Whistleblowing Procedure

### Internal Reports

Reports can be made through the reporting channels identified in the EU Whistleblower Policy.

### External Reports

Depending on the subject matter, Reports can also be made to the external reporting channels, listed on the website of the federal institute in charge of protecting and promoting human rights at (authority designated as competent body to support and assist (potential) Reporters). This list is available in [Dutch](#), [French](#), or [German](#).

# Gartner Denmark

## Scope and Applicability

This document supplements the EU Whistleblower Policy and is implemented by Gartner Danmark ApS.

This Exhibit applies to Gartner Associates employed in Gartner Denmark and former Gartner Associates, consultants, contractors, agency workers, interns, officers, directors, shareholders, partners and holders of voting rights in the general meeting of the entity and volunteers working for Gartner Denmark ("**Reporters**").

## What is whistleblowing?

In addition to the Whistleblower Reporting Matters detailed in the EU Whistleblower Policy, according to local (Danish) law, a 'Whistleblower Reporting Matter' is also:

- Matters subject to the Danish Act on the Protection of Whistleblowers:
  - Criminal offences, including bribery, forgery of documents, hacking, eavesdropping, recording conversations between others, theft, embezzlement, fraud, data fraud, mandate fraud, extortion, etc.
  - Other serious or repeated violation of other legislation, including violations of tax laws, breach of confidentiality, breach of statutory duty to act and serious irregularities concerning accounting, internal accounting controls and auditing, as well as suspected corruption, etc.
  - Sexual harassment, including any unwanted verbal, non-verbal or physical conduct with sexual undertones with the purpose or effect of violating the dignity of another person.
  - Serious personal conflicts in the workplace, including for example violence or sexual assault, as well as serious harassment/discrimination based on race, sex, colour, language, property, national or social origin, political or religious affiliation, etc.
  - Other serious violations, including failure to comply with professional standards, which could, for example, result in a risk to the health and safety of persons, serious errors and irregularities related to IT operations or IT systems management, specific cases where minor non-cooperation poses major risks and thus constitutes serious situations and serious and repeated breaches of internal guidelines and compliance rules.



## **Whistleblowing Procedure**

### **Internal Reports**

Reports can be made through the reporting channels identified in the EU Whistleblower Policy.

If a Reporter wishes to remain anonymous, it is important that they do not enter their name anywhere in the report or add any information that would disclose their identity.

### **External Reports**

Whilst Reports are encouraged to raise any concern about the Whistleblower Reporting Matters internally first, this is not obligated. Gartner strongly encourages Reporters to use the Ethics Helpline or other channels of communication within Gartner Denmark to help ensure that the right measures are taken as soon as possible. If a Reporter is dissatisfied with the handling of a report and does not believe that it can be resolved by using the internal helpline channel or any other channels of communication within Gartner Denmark, it is also possible to report externally to:

- The Danish Data Protection Authority, <https://whistleblower.dk/>

### **Anti-Retaliation**

Protection from retaliation can apply to both the person who the whistleblower's report or disclosure is about, or a physical or legal person associated with the affected person (for example, a spouse).

# Gartner Finland

## Scope and Applicability

This document supplements the European Whistleblower Policy and is implemented by Gartner Finland Oy.

This Exhibit applies to Gartner Associates employed in Gartner Finland and former Gartner Associates, consultants, contractors, agency workers, interns, officers, directors, shareholders, partners and holders of voting rights in the general meeting of the entity and volunteers working for Gartner Finland ("**Reporters**").

## What is whistleblowing?

In addition to the Whistleblower Reporting Matters detailed in the EU Whistleblower Policy, according to local law, a 'Whistleblower Reporting Matter' is also a complaint or concern raised in relation to

- breaches affecting the financial interests of the European Union,
- breaches relating to European Union' internal market, competition and state aid rules, and corporate taxation.

## Whistleblowing Procedure

### Internal Reports

Reports can be made through the reporting channels identified in the EU Whistleblower Policy.

### External Reports

Reports should primarily be made through one of the internal reporting channels mentioned in the EU Whistleblower Policy. However, reports can also be made to the Chancellor of Justice's whistleblowing channel if the Reporter has reasonable grounds to believe that:

- no action has been taken to assess the accuracy of the allegations made in the report and, if needed, addressing the breaches reported within three months after the original report has been received;
- the breach cannot be effectively addressed on the basis of the internal report; or
- they are at risk of retaliation as a result of the reporting.

## **Personal Data / Retention details.**

Any report under this EU Whistleblower Policy shall be treated as confidential and shall only be disclosed in the manner as described in the EU Whistleblower Policy of Gartner.

# Gartner France

## Scope and Applicability

This document supplements the European Whistleblower Policy and is implemented by Gartner France SARL.

This Exhibit applies to Gartner Associates employed in Gartner France and former Gartner Associates, consultants, contractors, agency workers, interns, officers, directors, shareholders, partners and holders of voting rights in the general meeting of the entity and volunteers working for Gartner France.

(“Reporters”).

## What is whistleblowing?

In addition to the Whistleblower Reporting Matters detailed in the EU Whistleblower Policy according to local (French) law, a ‘Whistleblower Reporting Matter’ is also a concern relating to:

- Activities conducted by the Ministry of Defense;
- Public Statistics;
- Agriculture;
- National Education and higher education;
- Individual and collective employment relations and working conditions;
- Employment and vocational training;
- Culture;
- Freedom and rights within State administrations, public bodies, overseas territories and bodies entrusted with a public mission;
- Children’s best interest and rights;
- Discrimination; and
- Ethics of persons engaged in security activities.

## Whistleblowing Procedure

### Internal Reports

Reports can be made through the reporting channels identified in the EU Whistleblower Policy. In addition, you may also report to:

[France.Reporting@gartner.com](mailto:France.Reporting@gartner.com)

At the request of the Individual and according to their choice, during a videoconference or a physical meeting organized no later than twenty working days ("jours ouvrés") after receipt of the Report.

## **External Reports**

Whilst we encourage Reporters to raise any concern about the Whistleblower Reporting Matters internally first, this is not obligated and Reporters can report directly if preferred. In addition, it is possible to make an external report after having made an internal report.

The external reporting channels are set out in Appendix 1.

## **Public Disclosures**

A public disclosure (after an external or internal report) are only permitted:

- if the external report is not processed after a certain period of time
- if there is a risk of retaliation or if the report has no chance of succeeding, or
- in case of serious and imminent threat of danger to the whistleblower or manifesting an imminent danger to the general public.

However, an alert cannot be immediately made public if it affects the interests of defence and national security.

## **Annex 1:**

### **1. Marchés publics:**

- Agence française anticorruption (AFA), pour les atteintes à la probité;
- Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF), pour les pratiques anticoncurrentielles;
- Autorité de la concurrence, pour les pratiques anticoncurrentielles ;

### **2. Services, produits et marchés financiers et prévention du blanchiment de capitaux et du financement du terrorisme:**

- Autorité des marchés financiers (AMF), pour les prestataires en services d'investissement et infrastructures de marchés;
- Autorité de contrôle prudentiel et de résolution (ACPR), pour les établissements de crédit et organismes d'assurance;

### **3. Sécurité et conformité des produits:**

- Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF);
- Service central des armes et explosifs (SCAE);

### **4. Sécurité des transports:**

- Direction générale de l'aviation civile (DGAC), pour la sécurité

des transports aériens;

- Bureau d'enquêtes sur les accidents de transport terrestre (BEA-TT), pour la sécurité des transports terrestres (route et fer);
- Direction générale des affaires maritimes, de la pêche et de l'aquaculture (DGAMPA), pour la sécurité des transports maritimes;

### **5. Protection de l'environnement:**

- Inspection générale de l'environnement et du développement durable (IGEDD);

### **6. Radioprotection et sûreté nucléaire :**

- Autorité de sûreté nucléaire (ASN);

### **7. Sécurité des aliments:**

- Conseil général de l'alimentation, de l'agriculture et des espaces ruraux (CGAAER);
- Agence nationale chargée de la sécurité sanitaire de l'alimentation, de l'environnement et du travail (ANSES);

### **8. Santé publique:**

- Agence nationale chargée de la sécurité sanitaire de l'alimentation, de l'environnement et du travail (ANSES) ;
- Agence nationale de santé publique (Santé publique France, SpF) ;
- Haute Autorité de santé (HAS) ;

- Agence de la biomédecine ;
- Etablissement français du sang (EFS) ;
- Comité d'indemnisation des victimes des essais nucléaires (CIVEN) ;
- Inspection générale des affaires sociales (IGAS) ;
- Institut national de la santé et de la recherche médicale (INSERM) ;
- Conseil national de l'ordre des médecins, pour l'exercice de la profession de médecin ;
- Conseil national de l'ordre des masseurs-kinésithérapeutes, pour l'exercice de la profession de masseur-kinésithérapeute ;
- Conseil national de l'ordre des sages-femmes, pour l'exercice de la profession de sage-femme ;
- Conseil national de l'ordre des pharmaciens, pour l'exercice de la profession de pharmacien ;
- Conseil national de l'ordre des infirmiers, pour l'exercice de la profession d'infirmier ;
- Conseil national de l'ordre des chirurgiens-dentistes, pour l'exercice de la profession de chirurgien-dentiste ;
- Conseil national de l'ordre des pédicures-podologues, pour l'exercice de la profession de pédicure-podologue ;
- Conseil national de l'ordre des vétérinaires, pour l'exercice de la profession de vétérinaire ;

#### 9. Protection des consommateurs:

- Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF);

#### 10. Protection de la vie privée et des données personnelles, sécurité des réseaux et des systèmes d'information:

- Commission nationale de l'informatique et des libertés (CNIL);
- Agence nationale de la sécurité des systèmes d'information (ANSSI) ;

#### 11. Violations portant atteinte aux intérêts financiers de l'Union européenne:

- Agence française anticorruption (AFA), pour les atteintes à la probité;
- Direction générale des finances publiques (DGFiP), pour la fraude à la taxe sur la valeur ajoutée;
- Direction générale des douanes et droits indirects (DGDDI), pour la fraude aux droits de douane, droits anti-dumping et assimilés;

#### 12. Violations relatives au marché intérieur:

- Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF), pour les pratiques anticoncurrentielles;
- Autorité de la concurrence, pour les pratiques anticoncurrentielles et les aides d'Etat;
- Direction générale des finances publiques (DGFiP), pour la fraude à l'impôt sur les sociétés;

#### 13. Activités conduites par le ministère de la défense:

- Contrôle général des armées (CGA);
  - Collège des inspecteurs généraux des armées;
14. Statistique publique:
- Autorité de la statistique publique (ASP);
15. Agriculture:
- Conseil général de l'alimentation, de l'agriculture et des espaces ruraux (CGAAER);
16. Education nationale et enseignement supérieur:
- Médiateur de l'éducation nationale et de l'enseignement supérieur;
17. Relations individuelles et collectives du travail, conditions de travail:
- Direction générale du travail (DGT);
18. Emploi et formation professionnelle:
- Délégation générale à l'emploi et à la formation professionnelle (DGEFP);
19. Culture:
- Conseil national de l'ordre des architectes, pour l'exercice de la profession d'architecte;
  - Conseil des maisons de vente, pour les enchères publiques;
20. Droits et libertés dans le cadre des relations avec les administrations de l'Etat, les collectivités territoriales, les établissements publics et les organismes investis d'une mission de service public:
- Défenseur des droits;
21. Intérêt supérieur et droits de l'enfant:
- Défenseur des droits;
22. Discriminations:
- Défenseur des droits;
23. Déontologie des personnes exerçant des activités de sécurité:
- Défenseur des droits.



# Gartner Germany

## Scope and Applicability

This document supplements the European Whistleblower Policy and is implemented by Gartner Deutschland GmbH.

This Exhibit applies to Gartner Associates employed by in Gartner Germany and former Gartner Associates, job applicants, consultants, contractors, customers, agency workers, interns, officers, directors, shareholders, partners and holders of voting rights in the general meeting of the entity and volunteers working for Gartner Germany ("Reporters").

## What is whistleblowing?

In addition to the Whistleblower Reporting Matters detailed in the EU Whistleblower Policy a Whistleblower Reporting matter under the German Whistleblower Protection Act also includes:

- Criminal offenses;
- Violations subject to financial penalties - but only if the violated regulation serves to protect life, health or to protect the rights of Gartner Associates or their representative bodies;
- Violations of the regulations on the commissioning of public contracts and concessions;
- Violations of tax law applicable to companies;
- Violations of regulations for the protection of investors.

## Whistleblowing Procedure

### Internal Reports

Can be made in accordance with the reporting channels outlined in the EU Policy.

### External Reports

Reports may also be made externally to:

- External reporting unit of the Federal Department of Justice (Bundesamt für Justiz);
- External reporting unit of Federal Cartel Office (Bundeskartellamt);
- External reporting unit of the financial regulatory authority (BAFIN);
- External reporting unit of the European Commission (Europäische Kommission), the European Anti-Fraud Office (OLAF – Europäisches Amt für Betrugsbekämpfung), the European Maritime Safety Agency (EMSA – Europäische Agentur für die Sicherheit des Seeverkehrs), the European Aviation

Safety Agency (EASA – Europäische Agentur für Flugsicherheit), the European Securities and Markets Authority (ESMA – Europäische Wertpapier- und Marktaufsichtsbehörde) and the European Medicines Agency (EMA – Europäischen Arzneimittel-Agentur).

Please be aware of the respective responsibilities of the external reporting units.

### **Personal Data / Retention details.**

Any report under this Whistleblower Policy shall be treated as confidential and shall only be disclosed in the manner as described in the EU Whistleblower Policy of Gartner and in compliance with the General Data Protection Regulation and the German Whistleblower Protection Act.

# Gartner Ireland

## Scope and Applicability

This document supplements the European Whistleblower Policy and is implemented by Gartner Ireland.

This Exhibit applies to Gartner Associates employed in Gartner Ireland and former Gartner Associates, consultants, contractors, trainees, job applicants, volunteers, members of the administrative, management or supervisory body, agency workers, interns, officers, directors, shareholders, partners and holders of voting rights in the general meeting of the entity and volunteers working for Gartner Ireland (“Reporters”).

## What is whistleblowing?

In addition to the Whistleblower Reporting Matters detailed in the EU Whistleblower Policy, according to local (Irish) law, a ‘Whistleblower Reporting Matter’ is also:

- The committing of an offence.
- Miscarriages of justice.
- Unlawful or improper use of funds and/or resources of a public body, or of other public money.
- An act or omission of a public body is oppressive, discriminatory, grossly negligent or constitutes gross mismanagement.

If a Reporter is uncertain whether something is within the scope of the Policy, they can seek advice from the designated person, whose contact details are at the end of this addendum.

## Whistleblowing Procedure

### Internal Reports

Reports can be made through the reporting channels identified in the EU Whistleblower Policy.

Upon request, a Reporter may raise a concern under the Policy by means of a physical meeting, by contacting the designated person using the contact details at the end of this addendum.

### External Reports

Whilst Reporters are encouraged to raise any concern about the Whistleblower Reporting Matters internally first, this is not obligated. If a Reporter prefers to report externally, this report can be made to an external authority (see external list located

here (<https://www.gov.ie/en/collection/41798-protected-disclosures-whistleblowing-list-of-prescribed-persons/> such as a regulator) or the Protected Disclosures Commissioner (within the Office of the Ombudsman).

It will very rarely if ever be appropriate to alert the media and in general you should only do so as a last resort. As there are specific provisions applicable to external disclosures, the company strongly encourages you to seek advice before reporting a concern externally and you should contact your direct line manager or the designated person for guidance.

### **Personal Data / Retention details.**

Any report under this EU Whistleblower Policy shall be treated as confidential and shall only be disclosed in the manner as described in the EU Whistleblower Policy of Gartner.

### **Contacts**

[Ireland.Reporting@gartner.com](mailto:Ireland.Reporting@gartner.com)

# Gartner Italia S.r.l.

## Scope and Applicability

This document supplements the European Whistleblower Policy and is implemented by Gartner Italia Srl.

This Exhibit applies to Gartner Associates employed in Gartner Italia Srl and former Gartner Associates, consultants, contractors, agency workers, interns, officers, directors, suppliers, partners, shareholders and volunteers working for Gartner Italy (“**Reporters**”).

## What is whistleblowing?

The following complaints or concerns can be raised:

Any conduct, act or omission that harms the public interest or integrity of the public administration or Gartner and, in particular:

- the Whistleblower Reporting Matters as detailed in the EU Whistleblower Policy
- In addition the Italian legislation also covers:
  - acts or omissions relating to the internal market, including violations of EU competition and state aid rules, as well as violations of corporate tax rules or mechanisms whose purpose is to obtain a tax advantage that frustrates the object or purpose of the applicable corporate tax law
  - administrative, accounting, civil or criminal offenses that do not fall under the above;
  - unlawful conduct relevant under Legislative Decree No. 231 of June 8, 2001 not falling under the above offenses;
  - other offenses set forth in the Annex to Legislative Decree No. 24 of March 10, 2023 (**Attachment 1**) or of national acts that constitute implementation of the acts of the European Union set forth in the Annex to Directive (EU) 2019/1937.

This document does not apply:

- to challenges, claims or demands related to a matter of personal interest of the Reporter, where the disclosure is prohibited because they are covered by national security, medical secrecy, secrecy of judicial deliberations, judicial investigations or judicial enquiries or legal professional secrets.

## Whistleblowing Procedure

### Internal Reports

In addition to the reporting channels identified in the EU Whistleblower Policy, Reporters may also report about matters relevant under Legislative Decree No. 231 of June 8, 2001 to:

Organismo di Vigilanza: DL.OdV.Italia@gartner.com

### External Reports

Reports may also be made through the way established by ANAC (so-called “External Reporting”) available at the following link: <https://www.anticorruzione.it/-/whistleblowing> if one of the following conditions is met:

- A Reporter has already made an internal report and does not think this has been handled in line with the applicable processes;
- If, based on reasonable grounds, a Reporter believes that if they made an internal report, it would not be effectively followed up, or that the internal report itself may result in the risk of retaliation;
- If, based on reasonable grounds, a Reporter believes that the violation may constitute an imminent or obvious danger to the public interest.

### Personal Data and Data Retention Periods

The personal data processed in the context of a disclosure shall be processed in compliance with applicable data protection legislation and company policy, including the EU Regulation 679/2016 (“GDPR”), the Italian Legislative Decree no. 196/2003 and [Gartner Employee Privacy Policies](#).

### Protection of Reporters

Reporters will be protected by Gartner, in compliance with the provisions of Legislative Decree No. 24 of March 10, 2023.

Gartner will ensure the protection of the Reporters with the anti-retaliation section of the EU Whistleblower Policy.

The protections provided also apply, among others, to: (i). the legal representatives of Gartner Associates in the exercise of their functions of advising and supporting the Reporter; (ii). individuals who, within the organisation in which the Reporter works, assist the Reporter in the reporting process; (iii). individuals who are related to the Reporter and who may suffer reprisals, such as co-workers or relatives of the Reporter; and (iv). individuals for whom the Reporter works or with whom he/she has any other

type of relationship in an employment context or in which he/she has a significant shareholding.

## **Publicity**

In order to ensure the knowability of the procedure and requirements for making Reports, this document is displayed, in hard copy, on the company bulletin board and is posted, in electronic format, on the company intranet.

## **Attachments**

- 1) Attachment to Legislative Decree No. 24 of March 10, 2023;

<https://www.gazzettaufficiale.it/eli/id/2023/03/15/23G00032/sq>

# Gartner Netherlands

## Scope and Applicability

This document supplements the European Whistleblower Policy and is implemented by Gartner Nederland B.V.

This Exhibit applies to Gartner Associates employed in Gartner the Netherlands and former Gartner Associates, consultants, contractors, agency workers, interns, officers, directors, shareholders, partners and holders of voting rights in the general meeting of the entity and volunteers working for Gartner the Netherlands (“Reporters”).

## What is whistleblowing?

In addition to the Whistleblower Reporting Matters detailed in the EU Whistleblower Policy, according to local (Dutch) law, a ‘Whistleblower Reporting Matter’ is also:

- a breach or risk of a breach of Union law, or
- an act or omission with regard to which the public interest is at stake in connection with:
  - a breach or risk of a breach of a statutory regulation or of internal rules that impose a specific obligation and have been established by an employer on the basis of a statutory regulation; or
  - a risk to public health, public safety or the environment, or an improper act or omission that jeopardizes the proper functioning of the public services or an undertaking. A public interest is in any event at stake if the act or omission affects more than just personal interests and is either part of a pattern or structural in nature, or is serious or broad in scope.

## Whistleblowing Procedure

### Guidance Available

If a potential Reporter suspects an integrity violation or wrongdoing and needs some support, they can contact an internal confidential advisor to assist you with this. The contact details of the internal confidential advisor is Koen Van Lierop [Netherlands.Reporting@gartner.com](mailto:Netherlands.Reporting@gartner.com).

A Reporter or potential Reporter can also contact the House for Whistleblowers (Huis voor Klokkenluiders) anonymously for information and advice ([www.huisvoorklokkenluiders.nl](http://www.huisvoorklokkenluiders.nl)).



## Internal Reports

Reports can be made through the reporting channels identified in the EU Whistleblower Policy.

## External Reports

Whilst we encourage Reporters to raise any concern about the Whistleblower Reporting Matters internally first, this is not obligated. If a Reporter prefers to report externally, they can report to an authority that is competent on the subject of the Whistleblower Reporting Matter. If a Reporter chooses to report directly externally, they will receive the same protection as when reporting internally.

To report externally, you can approach directly the following competent authorities:

- the Whistleblowers Authority (in Dutch: Huis voor Klokkenluiders), [www.huisvoorklokkenluiders.nl](http://www.huisvoorklokkenluiders.nl)
- the Netherlands Authority for Consumers & Markets (in Dutch: Autoriteit Consument en Markt), [www.acm.nl](http://www.acm.nl);
- the Dutch Authority for the Financial Markets (in Dutch: Autoriteit Financiële Markten), [www.afm.nl](http://www.afm.nl);
- De Nederlandsche Bank N.V. (in Dutch: DNB), [www.dnb.nl](http://www.dnb.nl) ;
- the Health and Youth Care Inspectorate (in Dutch: Inspectie Gezondheidszorg en Jeugd), [www.igj.nl](http://www.igj.nl) ;
- the Dutch Healthcare Authority (in Dutch: Nederlandse Zorgautoriteit), [www.nza.nl](http://www.nza.nl) ;
- the Authority for Nuclear Safety and Radiation Protection (in Dutch: Autoriteit Nucleaire Veiligheid en Stralingsbescherming), [www.autoriteitnvs.nl](http://www.autoriteitnvs.nl);
- the Dutch Data Protection Authority (in Dutch: Autoriteit Persoonsgegevens), [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl);
- the Human Environment and Transport Inspectorate (in Dutch: Inspectie Leefomgeving en Transport), [www.ilent.nl](http://www.ilent.nl);;
- the Netherlands Labour Authority (in Dutch: Nederlandse Arbeidsinspectie), [www.nlarbeidsinspectie.nl](http://www.nlarbeidsinspectie.nl);
- the Netherlands Food and Consumer Product Safety Authority (in Dutch: Nederlandse Voedsel- en Warenautoriteit), [www.nvwa.nl](http://www.nvwa.nl)

The competent authorities' websites contain the procedure for making an external report.

## Personal Data / Retention details

Any report under this EU Whistleblower Policy shall be treated as confidential and shall only be disclosed in the manner as described in the EU Whistleblower Policy of Gartner.

# Gartner Spain

## Scope and Applicability

This document supplements the European Whistleblower Policy and is implemented by all Gartner entities in Spain.

This Exhibit applies to Gartner Associates employed in Spain and former Gartner Associates, consultants, contractors, agency workers, interns, officers, directors, shareholders, partners and holders of voting rights in the general meeting of the entity and volunteers working for Gartner Spain (“**Reporters**”).

## What is whistleblowing?

In addition to the Whistleblower Reporting Matters detailed in the EU Whistleblower Policy, the following complaint is also covered under local law:

- Any action or omission that may constitute a serious or very serious criminal or administrative offense.

## Whistleblowing Procedure

### Internal Reports

Reports can be made through the reporting channels identified in the EU Whistleblower Policy. The ethics Helpline enables communication with the Reporters.

### External Reports

Reports may also be made before the following external channels:

European Union: <https://commission.europa.eu/about/contact/problems-and-complaints>  
Independent Whistleblower Protection Authority. (Autoridad Independiente de Protección al Informante): <https://www.proteccioninformante.gob.es>  
Comunidad de Madrid: [canalexternoinformantecm@madrid.org](mailto:canalexternoinformantecm@madrid.org)  
Catalunya: <https://www.antifrau.cat/es/investigacion/denuncia.html>

Or before the corresponding regional authorities or bodies, either directly or after communication through the corresponding internal channel.

**Retention details.** Gartner will maintain an accurate, detailed, and up-to-date registry of all communications for the period necessary and appropriate to comply with current legislation and relevant prescription periods. This registry will guarantee the confidentiality requirements provided for in Law 2/2023 and must at all times comply with the applicable personal data protection regulations.

## **Personal Data**

Gartner will handle the personal data received through Reports, as well as the personal data related to any investigation, in compliance with applicable laws. Individuals will have the right to access the recorded data, except for the identity of the Reporter, and the right to rectify any personal data that is inaccurate or incomplete, as well as the right to privacy, honor and personal image and data protection, in accordance with the Spanish data protection legislation.

## **Rights**

Gartner will have full respect for the presumption of innocence and the honor of everyone. Likewise, Gartner will respect the right to be heard once the individual has been informed of the actions or omissions attributed to them.

## **External Communications**

Gartner will immediately send information to the Public Prosecutor's Office in the event that the facts could be constituting a crime. If the facts could be contrary to the financial interests of the European Union, the information will be referred to the European Union Prosecutor's Office.

# Gartner Sweden

## Scope and Applicability

This document supplements the European Whistleblower Policy and is implemented by Gartner Sverige AB.

This Exhibit applies to Gartner Associates employed in Gartner Sweden, job applicants and former Gartner Associates, volunteers, consultants, contractors, agency workers, interns, officers, directors, shareholders, partners and holders of voting rights in the general meeting of the entity ("Reporters").

## What is whistleblowing?

Whistleblowing is the reporting of any misconduct in a work-related context for which there is a public interest that the misconduct is exposed. The meaning of a work-related context refers to both current and previous work within the Company, where individuals have received information about misconduct.

Examples of misconduct that is considered whistleblowing matters include, but is not limited to, the Whistleblower Reporting Matters detailed in the EU Whistleblower Policy.

Please note that this Exhibit Addendum does not cover the reporting of information relating to the national security of certain authorities and classified information under the Swedish Security Protection Act (SFS 2018:585).

## Whistleblowing Procedure

### Internal Reports

Reports can be made through the reporting channels identified in the EU Whistleblower Policy.

Whistleblowers may also raise concerns verbally, in writing or by requesting a meeting. You can do this by using the following local reporting methods:

- in writing, by email to [Sweden.Reporting@gartner.com](mailto:Sweden.Reporting@gartner.com),
- verbally, by calling number +46 70 624 65 38, or
- requesting a meeting by either sending an email or calling the above telephone number, or directly reaching out to [Sweden.Reporting@gartner.com](mailto:Sweden.Reporting@gartner.com).

Regarding questions of interpretation concerning the working environment, HR matters or other similar questions, you should primarily contact the Company's HR unit as such matters do not fall under this Policy and Exhibit. .

Whilst Reports do not need to present solid evidence to support their suspicions, they must be convinced that the circumstances that gave rise to the suspicion of the misconduct are factual. It is prohibited to make reports with malicious intent or otherwise with the use of incorrect information. Individuals who knowingly report misleading or wrongful information are not covered by the protection against retaliation in the Swedish Whistleblowing Act (SFS 2021:890). The Company will take appropriate action in such instances.

In addition to the right to report on misconduct in a work-related context for which there is a public interest (that the misconduct is exposed), the Freedom of the Press Act (SFS 1949:105) and the Fundamental Law on Freedom of Expression Act (SFS 1991:1469) contain rules regarding an individual's right to:

- disclose information (regarding any subject) to certain parts of the media without having to face any retaliation, and
- obtain information (regarding any subject) for the purpose of disclosing it to certain parts of the media, without having to face any retaliation.

## **External Reports**

If a Reporter does not wish to report internally, an external report can be filed with an external national competent authority. In Sweden, the authority you would report to depends on the topic of the whistleblowing matter. A full list of the competent authorities (and their competences) can be found in the Appendix to the Swedish Whistleblowing Ordinance (SFS 2021:949), this has also been included below. Note that if no authority is competent, a report can be made to the Swedish Work Environment Authority (in Swedish "Arbetsmiljöverket"):

Arbetsmiljöverket (The Swedish Work Environment Authority)  
Boverket (The Swedish National Board of Housing, Building and Planning)  
Elsäkerhetsverket (The Swedish National Electrical Safety Board)  
Ekobrottsmyndigheten (The Swedish Economic Crime Authority)  
Fastighetsmäklarinspektionen (The Swedish Estate Agents Inspectorate)  
Finansinspektionen (The Swedish Finance Inspectorate)  
Folkhälsomyndigheten (Public Health Agency of Sweden)  
Havs- och vattenmyndigheten (The Swedish Agency for Marine and Water Management)  
Integritetsskyddsmyndigheten (The Swedish Authority for Privacy Protection)  
Inspektionen för strategiska produkter (The Swedish Inspectorate of Strategic Products)  
Inspektionen för vård och omsorg (The Swedish Health and Social Care Inspectorate)  
Kemikalieinspektionen (The Swedish Chemical Agency)  
Konsumentverket (The Swedish Consumer Agency)

Konkurrensverket (The Swedish Competition Authority)  
Livsmedelsverket (The Swedish Food Agency)  
Läkemedelsverket (The Swedish Medical Products Agency)  
Länsstyrelserna (County Administrative Boards)  
Länsstyrelsen för Stockholms län (County Administrative Board of Stockholm)  
Länsstyrelsen för Västra Götalands län (County Administrative Board of Västra Götaland)  
Länsstyrelsen för Skånes län (County Administrative Board of Skåne)  
Myndigheten för samhällsskydd och beredskap (The Swedish Civil Contingencies Agency)  
Naturvårdsverket (The Swedish Environmental Protection Agency)  
Post- och telestyrelsen (The Swedish Post and Telecom Authority)  
Regeringskansliet (The Swedish Government and Government Offices)  
Revisorsinspektionen (The Swedish Inspectorate of Auditors)  
Skatteverket (The Swedish Tax Agency)  
Skogsstyrelsen (The Swedish Forest Agency)  
Spelinspektionen (The Swedish Gambling Authority)  
Statens energimyndighet (The Swedish Energy Agency)  
Statens jordbruksverk (The Swedish Board of Agriculture)  
Styrelsen för ackreditering och teknisk kontroll (Swedac)  
Strålsäkerhetsmyndigheten (The Swedish Radiation Safety Authority)  
Transportstyrelsen (The Swedish Transport Agency)

## **Assessment of the report**

The function managing the reporting and follow-up procedure is independent and autonomous. The reporting and follow-up procedure includes:

- receiving the reports and maintaining contact with reporting individuals,
- following up the reports, and
- providing feedback to reporting individuals.

Once a report is filed, a written confirmation acknowledging that the report has been received will be provided within seven (7) days. However, this does not apply if you have waived the right to receive a confirmation. Nor does it apply if the Gartner can assume that a confirmation would reveal your identity.

Within three (3) months after the acknowledgement of receipt of your report, or within seven (7) days after the receipt if no confirmation has been given and it was not due to your waiver, we will respond to you regarding actions taken or envisaged to be taken to resolve the matter you have reported on.

## **Personal Data / Retention details**

Any report under this Whistleblower Policy shall be treated as confidential and shall only be disclosed in the manner as described in the EU Whistleblower Policy of Gartner and applicable law.