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A message from the CEO

Our customers, shareholders and stakeholders expect and deserve the highest level of ethics and integrity from everyone at IHS Markit. It is critical that we meet and exceed their expectations. This will allow us to build trust and respect, the foundations of strong collaborative relationships. It is through these relationships that we will build an enduring future.

Our corporate culture is built on our six core values: accountability, customer focus, inclusiveness, innovation, integrity and partnership. I believe that if we all embody these principles, it will dramatically impact our personal and professional success, from the day-to-day enjoyment of our work together, to the quality of the work we deliver, and the way we engage with our customers and other stakeholders.

As colleagues, officers and board members of IHS Markit, we are responsible for reading, understanding and adhering to our Business Code of Conduct as well as setting an example for others. Our Code goes beyond what is required by law or regulation – it requires each of us to abide by our values in every decision and action we take. It details the high standards we expect when representing or acting on behalf of IHS Markit.

I encourage you to bring passion, integrity and energy to everything you do, and to take advantage of the many opportunities that IHS Markit can offer you. Thank you for your commitment and contribution to our company’s success.

Lance Uggl
Chairman and CEO
Statement of values

Integrity
Accountability
Inclusiveness
Innovation
Partnership
Customer Focus
Our company has strong values

Purpose of the code

Our company is based on a foundation of integrity – of having strong values and principles. This Business Code of Conduct ("code") outlines what we stand for, our ethical standards and how we conduct business. It also serves as a guide to our decision-making and helps us work through questions we might face when working for IHS Markit.

Our code cannot cover every situation. For this reason, we have separate corporate policies, procedures and guidelines for our business practices which provide more detail and information. Please refer to these additional materials which we reference throughout the Code, to better understand our expectations and requirements.

Abiding by legal requirements, ethical standards and this code is critically important for all of us. Failure to do so could subject individuals and the company to fines and criminal penalties and could cause IHS Markit to lose its ability to conduct business around the world. It could also cause serious damage to our reputation. Keep in mind that there may be times when the laws differ regionally. If you find yourself in a situation where local law or custom conflicts with our code or other company policies, remember to follow the stricter of the two.

Application of the code

Our code applies to all colleagues, officers and board members in all locations where we conduct business. We also expect our contractors, suppliers and other business partners to comply with the law and ethical standards described in our code, as well as the Third Party/Vendor Code of Conduct which applies to all vendors, contingent workers and channel partners. You can find a link to our Third Party/Vendor Code of Conduct here.
We all have shared responsibilities

Our responsibilities

We will:
– Read and follow the code as well as all company policies, procedures and guidelines that govern our work.
– Never engage or encourage someone else to act in a way that is prohibited by our code and not work with any individual who violates the law or the standards established in our code.
– Comply with all applicable laws, rules and regulations.
– Cooperate if asked to participate in any investigation or audit. This includes a responsibility to be honest and thorough as well as a commitment to never mislead or improperly influence an auditor or investigator.
– Promptly report concerns related to ethical misconduct, including violations of this code, our policies or the law. This includes conduct by vendors or other business partners.

To find policies, procedures, guidelines or business practices that apply to your work:
– Refer to the policies page on INFOnet
– Click on the hyperlinks in this code
– Contact your human resources representative
– Contact your individual business unit leader
– Contact corporate compliance
People manager responsibilities

Anyone who manages other employees has additional responsibilities when it comes to our code. We expect managers to not only act in accordance with this code, but also to serve as ethical role models for colleagues, consistently demonstrating our company values. People managers must:

- Communicate the importance of the code and create a positive work environment where everyone feels comfortable asking for help and raising concerns.
- Make sure that their employees understand all policies that apply to their work and how they can locate them.
- Be alert to conduct that may violate the code or other company policies, or that may put the company at risk.
- Take immediate action and promptly report actual or suspected violations of the code, law or company policies, or any other compliance or ethics concerns. (Check the people manager community on INFOnet for guidance.)
- Clearly communicate our company’s “no retaliation” policy.
We are not afraid to speak up

Ask yourself…

At times, you may find yourself in a situation where you are unsure of the right course of action. When this happens, ask yourself the following questions:

- Do I feel good about my decision?
- Does my decision or action comply with our code and other company policies?
- Do I have all the information I need to make an informed decision?
- Can I confidently defend my decision or action to my colleagues, manager, regulators or a government agency?
- Would I feel comfortable if the public knew about my decision?
- Would I want my friends, family or colleagues to learn about how I conducted myself?

If your answers to these questions do not help you make your decision, seek guidance before proceeding. Remember, even if an action is technically legal but appears unethical, you should consider making a different choice.

Speaking up

One of the most important responsibilities we have is to understand when something is not right and speak up about it. We are all required to raise concerns that relate to violations of this code, our policies or the law or regulations. Speaking up takes courage and is not always easy, but when you speak up promptly, completely and truthfully, you enable the company to respond to concerns. When we become aware of potential issues, we can work to resolve them and minimize damage to our company, our employees, our customers and anyone else who may be harmed.
Where to seek help and report concerns

We have many ways to report a concern. Speaking with your manager is always a good place to start, as they often have a good understanding of your department and your work situation. If you are not comfortable starting with your manager, you may also contact any of the following:

- A local or regional human resources representative
- A local or regional legal representative
- The head of internal audit
- The chief compliance officer
- The chief people officer
- The general counsel
- The chief executive officer
- Our compliance hotline

Our compliance hotline is a secure, third-party telephone and web-based service that is available 24 hours per day, seven days per week and allows for reporting in a variety of languages. Where local law allows, you may call the compliance hotline anonymously. Keep in mind, however, that maintaining your anonymity may limit our ability to address your concerns or conduct an effective investigation. See our Compliance Hotline and Reporting Misconduct policy or our compliance hotline website at www.ihsmarkithotline.ethicspoint.com for additional information about submitting a report.
No retaliation

Our people, if acting in good faith, should never be afraid to be penalized for making a report. We prohibit retaliation against anyone who truthfully reports known or suspected unethical or illegal misconduct, seeks advice, raises a concern or provides information in an internal or external investigation or legal proceeding that relates to the company. Retaliation can come in obvious and more subtle forms. For example, it can range from firing someone for making a report, to taking away some of their responsibilities or verbally harassing them.

If we become aware of potential retaliation, we will investigate these concerns, and any individuals responsible for retaliation will be subject to disciplinary action, up to and including termination of employment. If you believe you have experienced retaliation for raising a concern or for cooperating in an investigation, immediately contact the compliance hotline or anyone listed in “Where to seek help and report concerns.”

After a report is made

We will promptly investigate all reports of potential misconduct and then take appropriate action in accordance with the results of the investigation. We will do everything possible to keep reports and complaints confidential to the fullest extent allowed by local law and consistent with resolution of the issue. If the company determines that individuals have violated the law, the code or company policy, the individuals involved will be subject to disciplinary action, up to and including termination of employment. The company may also report misconduct to the proper authorities, which may lead to civil and/or criminal prosecution.

Go right to the source

For additional information, see the following policies:

- Compliance hotline and reporting misconduct
- Policy prohibiting harassment, discrimination and retaliation
We treat each other with respect and keep one another safe

Inclusion and diversity

When we bring different experiences and perspectives to the table, we can look at things with a broader lens. We value how individual ideas make us stronger as a whole. We support an inclusive culture and do not tolerate discrimination of any kind.

Put it into action

- Listen to one another and keep an open mind when sharing and discussing ideas.
- Make employment-related decisions, such as who to hire for a certain role, based on the individual’s ability to do the best possible job.
- Never treat someone differently based on their background, their beliefs or what they look like.
- Never make a remark, joke or slur that is offensive or discriminates against a group or class of people.
Be an expert ...

Discrimination happens if someone is mistreated because of certain traits or defining characteristics. Discrimination can include behaviors, gestures, remarks, jokes or slurs that are offensive to or discriminate against a group or class of people.

Our policy goes beyond the law and protects any group of people with certain common characteristics from employment discrimination on the basis of those characteristics. Examples include race, religion, gender and gender identity. Please refer to our policy for a full list of those characteristics.

Delivering on our values

When we model inclusiveness, we promote and support a diverse, yet unified team.

Go right to the source

For additional information, see the following policies:

– Inclusion and diversity statement
Mutual respect

We work together to treat one another with decency and respect each and every day. We hold ourselves to the highest standard of behavior no matter who we are working with and no matter where we conduct our work, and we will not tolerate harassment of any kind. We expect the same from third parties working with us.

Put it into action

- Demonstrate professional and respectful behavior at all times.
- Recognize inappropriate behavior if you see it – and then speak up about it using the reporting options described above. If you are a manager, you have a particular duty to speak up.
- Do not participate in conversations that involve sexual jokes or references, slurs, or jokes or references to any protected characteristic.
- Never intimidate, mistreat or bully someone.
Be an expert ...

Harassment is offensive behavior that interferes with another's work environment or creates an intimidating or hostile workplace. Harassment can take many forms and may or may not be sexual in nature. Harassing or bullying behavior includes, but is not limited to:

- unwelcome sexual attention, advances or remarks
- sharing sexually explicit, lewd or violent imagery or language
- unwanted physical contact
- threatening, following or stalking
- unwanted or intrusive photos or recordings
- off-color jokes, relating to any protected characteristic
- derogatory or demeaning conduct, including disparaging comments about another's race, religion, ethnicity, sexuality or any other protected characteristic

Delivering on our values

When we act with integrity, we are respectful, open and honest, and treat everyone with the highest degree of dignity, equality and trust.

Go right to the source

For additional information, see the following policies:

- Policy prohibiting discrimination, harassment and retaliation
- Equal employment opportunity
Workplace safety and security

We owe it to one another to create and maintain a safe workplace. We are all responsible for complying with workplace health and safety rules, procedures, laws and regulations. This includes maintaining a workplace that is free from the misuse of alcohol and drugs and free from violence and weapons.

**Put it into action**

- Never act in a threatening or violent way.
- Know that firearms and weapons are not allowed on company property.
- Do not come to work or perform work on behalf of the company if you are impaired by any substance, including drugs or alcohol.
- Act responsibly and do not endanger your safety or the safety of others, especially at an event where alcohol is permitted.
- Report any unsafe condition that could create a danger to you or to anyone else.
- Follow security policies and procedures, including wearing your security badge if appropriate, and not allowing people to “tailgate” you when entering company property.
- Comply with all company policies for safely operating a motor vehicle while on company business.
- Follow all facility rules and instructions in the workplace when representing the company at a conference, event or other work-related venue.
Be an expert ...

We want everyone to feel safe when they come to our workplace. This requires all of us to take safety concerns seriously. If you see or become aware of an unsafe situation, report it immediately. You can contact any one of the following:

- Your onsite security personnel
- Your manager
- The human resources department
- Workplace resources
- The compliance hotline
- Your local law enforcement agency

Go right to the source
For additional information, see the following policies:

- Global workplace anti-violence
- Substance-free work environment
- Workplace health and safety
We are proud that we make decisions ethically

Fair dealing, antitrust and competition

We compete fairly in all aspects of our business and deal fairly with all our customers, suppliers, competitors and employees. We act honestly and fairly when we market our products and services, and we follow all competition and antitrust laws wherever we do business. We obtain information about competitors only if it is publicly available and never through unlawful or unethical means.

Put it into action

– Describe our products and services truthfully and accurately and never make false statements about our competitors’ products or services.

– Treat all customers fairly, never offering unfair advantages to certain customers over others. Hold our suppliers and business partners to this same standard.

– Do not discuss or make agreements with competitors that may restrict competition; consult the antitrust and competition compliance policy if you have questions.

– Do not enter into agreements with customers, suppliers or distributors which could restrict competition, such as tying products, fixing resale prices or refusing to sell to particular clients or buying from particular suppliers.

– Be especially careful at industry association meetings to avoid topics which could restrict competition and, if you find yourself unexpectedly involved in what might be an inappropriate conversation, stop the conversation immediately and report it to one of your compliance resources as soon as possible.
Be an expert ...

Understanding our competition is important, but we need to do it ethically. Never pretend that you are someone else to gain information, and never rely on information that was provided to, but not intended for, you. It is also your responsibility to protect any competitive information of IHS Markit and not to share it with a competitor without approval from corporate compliance or legal. This responsibility continues even when you may no longer be employed by IHS Markit. It also includes a commitment to honor all non-compete agreements, those which you may sign based on your relationship with IHS Markit and also those which you may have signed prior to working for IHS Markit.

Delivering on our values

When we conduct business with integrity, we rely on the strength of our products and services to move us forward as a company.

Go right to the source

For additional information, see the following policy:

- Antitrust and competition compliance
Anti-corruption

We avoid bribery and corruption at all costs and comply with all laws around the world prohibiting these behaviors. We have a zero-tolerance policy for promising or requesting bribes – or agreeing to receive them – from any person, whether that person works for the government or not.

Put it into action

- Never offer or accept something of value in connection with our business if it is offered in order to improperly impact business or to gain any other favorable action.
- Carefully choose transaction partners, agents, consultants and other third parties by conducting proper due diligence on the third party.
- Oversee all third parties that perform work on our behalf, as IHS Markit can be held accountable for their actions.
- Only make payments to identified and approved payees.
- Record all payments and transactions accurately and truthfully.
- Remember that there are more specific rules for you to follow when working with government officials or employees.
Be an expert ...

A “bribe” is broadly defined and includes “anything of value” that provides a financial or other advantage, including but not limited to cash payments, gifts, company shares, contractual rights, real estate/property, debt forgiveness, personal property, product discounts, loans, meals, entertainment, promises of employment, travel expenditures, political contributions, charitable donations and other interests arising from business relationships.

A “kickback” is the return of a sum of money already paid or due to be paid as a reward for making or fostering business arrangements. Keep in mind that, just as we cannot engage in bribery or provide or receive kickbacks, we also cannot engage a third party to engage in this activity on our behalf.

A “facilitation payment” means any payment to government personnel to expedite or to ensure they perform a routine, non-discretionary government action. For example, payments to speed up approval and processing of travel visas, work orders and licenses that have not been advertised and made available to the general public. Never accept, offer or pay a facilitation payment.

Delivering on our values

When integrity guides our decisions, we can always feel good about our business relationships and interactions.

Go right to the source

For additional information, see the following policies:

- Anti-corruption
- Business courtesies
- Travel and entertainment
Conflicts of interest

We must avoid conflicts of interest or even the appearance of a conflict of interest. Conflicts of interest occur when personal interests and relationships interfere with the company's interests and relationships, making it difficult to do our work objectively and fairly on behalf of the company. We all have a duty to disclose any situation that involves an actual or potential conflict of interest, or the appearance of a conflict of interest to our manager and corporate compliance. Disclose conflicts and potential or apparent conflicts as soon as you recognize them, so that we can work together to resolve them.

**Put it into action**

- Know how to identify situations which present an actual or potential conflict, or the appearance of a conflict, between your interests and the company's interests, or that could cause others to doubt the judgment, integrity or objectivity of IHS Markit.
- Recognize that if you have previously disclosed a conflict or potential conflict and that relationship changes, it is important to disclose this change.
- Do not take a business opportunity for yourself if it arises as a result of your position at IHS Markit.
- Do not compete directly with IHS Markit or use IHS Markit property or information or the company's position for personal gain.
- Keep in mind that conflicts of interest rules also apply to related parties, including your parents, children, siblings, grandparents, grandchildren, aunts, uncles, nieces, nephews, cousins, in-laws, half or step relatives, spouse or domestic partner; as well as anyone with whom you currently have, or have had in the past, an intimate or close personal relationship such as a consensual / romantic relationship or shared residence.
- Do not influence or participate in the selection, hiring, promotion, evaluation, compensation or work assignment of a related party.
Be an expert ...

Some examples of conflicts of interest include:

**Outside employment or business activities:** If you are an employee of IHS Markit, you may not take an outside position as an employee, consultant or director with a company that is an IHS Markit customer, supplier or competitor. Also, you may not accept outside employment or engage in any outside business activities if doing so could compete or appear to compete with IHS Markit business interests or interfere with your ability to perform your work for IHS Markit.

**Corporate opportunities:** You may not accept or pursue business or personal opportunities that arise as a result of your position at IHS Markit or through the use of IHS Markit property or information. You may never compete in any line of business with IHS Markit.

This includes:
- Business or investment opportunities, unless and until the company has had an opportunity to evaluate them and has decided not to pursue them
- Opportunities to purchase goods or services for personal use that are offered by our company’s suppliers on terms other than those available to the general public or established by company policy

**Personal relationships:** You may not have a direct or indirect reporting relationship with, supervise or make employment decisions about a family member or a related party as previously described. You may not facilitate an IHS Markit business relationship with a company in which you or a family member has ownership or other financial interest.

There are other types of conflicts of interest, such as financial conflicts, running for or holding public office or board participation that are not covered specifically in this code. Please refer to the Conflicts of interest policy for more specific information and examples.
Delivering on our values

We demonstrate **accountability** when we separate our personal interests from our business commitments.

**Go right to the source**
For additional information, see the following policy:

- [Conflicts of interest](#)
Business courtesies

We recognize that business courtesies, such as appropriate gifts, meals and entertainment, can help build business relationships. But when we exchange business courtesies, we need to use good judgment at all times. This means never allowing business courtesies to jeopardize or appear to jeopardize our ability to make fair and unbiased decisions.

Put it into action

- Give and receive business courtesies only if they are modest in nature, infrequent, related to a legitimate business purpose, legal and consistent with company policy, and unsolicited.
- Do not give or receive business courtesies if they have been solicited or given for an illegitimate purpose, such as to incentivize a business decision.
- Never give or accept cash or cash equivalents such as gift certificates or gift cards.
- Never give inappropriate or embarrassing business courtesies that could cause reputational harm to the company or customers, such as entertainment at adult venues.
- Record all business courtesies (given and received) on expense reports and in accordance with our policies.
- Ensure that business courtesies do not conflict with the recipient’s gift and entertainment policies.
- Never exchange business courtesies with government employees or officials without prior approval from corporate compliance.
- As a manager, review business courtesy approval requests from your team, including expense reimbursement requests, and ensure compliance with company policy.
Be an expert ...

Here are some guidelines for what makes business courtesies appropriate:

Appropriate gifts, meals and entertainment include:

- Promote good will and a successful working relationship
- Relate to a legitimate business interest
- Are reasonable in value and within our policy guidelines
- Are reasonable and customary in the country of location
- Do not take away an ability to be fair and objective
- Comply with both IHS Markit policies and the recipient’s policies
- Never involve an illegal activity or call into question our judgment
- Do not damage our reputation

Go right to the source

For additional information, see the following policies:

- Business courtesies
- Travel and entertainment
Trade compliance

We comply with all international trade laws, including import and export controls, economic sanctions and anti-boycott laws. Our work involves the sale and purchase of goods and services globally, so it is important that we understand how these rules apply to our jobs and comply with them.

Put it into action

- Know your customer, screen all parties prior to entering into transactions, and never conduct business with prohibited parties.
- Know that certain countries and destinations are subject to comprehensive sanctions, and as a result we generally cannot do business with any customers in those locations.
- Know that certain products, software, source code and technology are subject to export controls and understand how those rules apply to how you do your job.
- When applicable and as required, establish export eligibility of products and services, ensure recipients are authorized to receive such products and services, and secure all required licenses and documentation.
- Contact corporate compliance if you are ever asked to participate in a trade boycott.
Be an expert...

“Sanctions” are laws that prohibit transactions with certain entities, individuals and countries, and are commonly used by governments to achieve national security and foreign policy goals.

An “export” occurs when a product, service, technology or piece of information crosses a country’s border or, in certain circumstances, is transferred between citizens of different countries, even if the transfer occurs within a single country. A “boycott” is a situation in which one person, group or country refuses to do business with certain persons, groups or countries as a means of protest. As an international public company with a U.S. presence, we may not participate in or promote foreign boycotts that the U.S. does not support, such as the Arab League Boycott of Israel.

Requests for boycott cooperation may be difficult to identify, but they commonly appear in contracts, letters of credit or bid or proposal materials. It is important to note that anti-boycott provisions apply to both interstate and foreign commerce activities as well as to transactions that occur entirely outside of the U.S.

Delivering on our values

We show accountability by understanding and complying with applicable laws and responsibilities that govern the work we do.

Go right to the source

If you have additional questions, consult the Export controls and sanctions compliance page on INFOnet or contact corporate compliance:

- Export controls and sanctions compliance
- Contact corporate compliance for the most up to date information on restricted destinations, entities and individuals
Anti-money laundering

Money laundering enables criminals to hide the source of illegal funds. We have processes and procedures in place to identify and prevent money laundering and terrorist activity.

Put it into action

- Look out for and report transactions that involve large amounts of cash.
- Screen customers, potential customers and suppliers to ensure that our products and services cannot be used to facilitate money laundering or terrorist activity.
- Contact corporate compliance immediately if you witness or become aware of any suspicious activity.

Be an expert ...

Money laundering is the practice of disguising the ownership or source of illegally obtained funds through a series of transactions to “clean” the funds so they appear to be proceeds from legal activities.

Delivering on our values

We choose to work with companies and individuals who care about integrity the way we do, and we speak up if we see practices that concern us.
As a trusted partner, we safeguard our company and respect confidential information

When we protect our assets and keep confidential information safe, we are able to grow our business successfully while earning the trust and respect of our customers and business partners along the way.

**Company assets**

Our resources – including our physical, financial and information assets – enable us to create and provide the products and services upon which our customers and business partners rely. Those who chose to work with us trust us to use our assets appropriately and in ways that best support and advance our business.
Put it into action

- Use our company’s assets only to promote a legitimate business purpose.
- Protect IHS Markit property and information assets from theft, damage, loss and misuse.
- Safeguard our company’s confidential and proprietary information and our intellectual property, which includes our trademarks, patents, copyrights and inventions.
- Understand that your duty to protect the company’s confidential information exists even after you no longer work for the company.
- Never use the intellectual property of third parties, such as someone else’s printed materials or software, without permission.
- Spend company funds responsibly and in accordance with IHS Markit policies.

Be an expert ...

Proprietary information is any information that is owned by IHS Markit, including information in IHS Markit databases and confidential or publicly available information, whether or not such information is subject to copyright, patent or other intellectual property right protections. A few examples of proprietary information include:

- IHS Markit publications
- technical or financial information relating to current or future products, services or research
- business or marketing plans or projections
- earnings and other financial data
- personnel information, including executive and organizational changes
- software

Go right to the source

For additional information, see the following policy:

- Intellectual property
Information technology systems

Our information technology (IT) networks and systems drive our daily business activities and enable us to deliver our products and services. We are all responsible for keeping our IT networks and systems safe and must use them responsibly in accordance with applicable company policies.

Put it into action

- Never use company IT networks or systems to access, create, store or transmit inappropriate or illegal materials, such as anything that is defamatory, offensive or harassing.
- Follow all policies and procedures for the safe transmission of data, and never use our IT networks or systems to disclose another’s personal information inappropriately.
- Remember that, depending on where you are located, the company may monitor electronic communications and information created, accessed and/or stored on its IT systems.
As a trusted partner, we safeguard our company and respect confidential information.

**Be an expert ...**

Keep our IT systems safe:
- Protect your system passwords and comply with company policies for updating and creating passwords.
- Download software onto an IHS Markit computer or device only if it is approved by the company.
- Keep all mobile devices and laptops locked or safely in your possession at all time.
- Create, handle and store all information in accordance with its classification. This means if the information is classified as “confidential”, you must handle it in accordance with the company requirements for confidential information.

**Delivering on our values**

We all show **accountability** by keeping our networks and systems safe and secure.

**Go right to the source**

For additional information, see the following policies:
- Electronic communications and acceptable use of systems
- Information classification and handling
Data privacy and confidential information

We may come into contact with private and confidential information about our colleagues as well as other individuals with whom we work. There are laws in place to protect personal information. We are all responsible for protecting this information by complying with all applicable data privacy laws and procedures that exist in the countries where we do business.

**Put it into action**
- Do not access another colleague’s personal information without specific authorization and a legitimate business-related need.
- Do not share private and confidential information with anyone, either inside or outside the company, who does not have authorization and a business need to know it.
- Protect the information of all third parties with whom we do business.
- Follow all safeguards when handling personal information, including never discussing personal information out in the open or leaving it in public view.

**Be an expert ...**

**What is personal information?**
Personal information includes information that relates to or can help identify an individual. For example, something as basic a person’s name or work email address may be considered personal information. It can also include things like work history, social security number, age or race.

**Go right to the source**
For additional information, see the following policies:
- Privacy
- Electronic communications and acceptable use of systems
- Employee data protection
We are open and honest and act with integrity

We are transparent with our customers, investors and the public at large, enabling us to form meaningful and long-lasting partnerships that are based on trust.

Financial integrity and business records

We have an obligation to disclose company information, including financial information, to the public and to regulatory authorities, in a full, fair, accurate, timely and understandable manner. Our controls and procedures are designed to assist us in meeting these disclosure requirements and we take compliance with these requirements very seriously.

Put it into action

Be accurate, complete and timely whenever you submit information in company records — including financial, personnel, time and expense records.

- Ensure the reports and documents that IHS Markit files with or submits to regulatory authorities and other public communications made by IHS Markit include full, fair, accurate, timely and understandable disclosure.
- Never hide or mispresent company funds or create undisclosed or unrecorded fund accounts.
- Report sales and expenses accurately.
- Cooperate fully with accountants and internal and external auditors.
- Apply appropriate accounting principles and other accounting standards if you are involved in the preparation of financial statements or information.
- Keep all company records in compliance with the IHS Markit guidelines as well as applicable laws and regulations.
Be an expert ...

Properly maintaining and managing records is important and enables us to fulfill our disclosure requirements. Local laws and our company's guidelines determine how long we need to keep business records and how and when we must dispose of them.

There may be a time when you are notified by our legal department that the records you possess are relevant to an anticipated or pending litigation, investigation or audit. If this happens, follow the guidelines set forth in that notification and:

- Never alter, destroy or delete documents referenced in the notification unless our legal department instructs that you may do so.
- If you receive a subpoena or a request for information from a third party, submit the document to our legal department immediately before taking or promising to take any action.

Delivering on our values
Our focus on partnership drives us to be clear and transparent about our results so that we can earn the trust of those who rely on us.

Go right to the source
For additional information, see the following policy:

- Records retention and disposal
Inside information

While working at IHS Markit, you may become aware of material, nonpublic information ("inside information") about our company, other companies or the market in general. We all need to understand that there are securities laws which govern when we can buy and sell stock, and we must comply with these laws at all times.

Put it into action

- Never share inside information with unauthorized individuals inside the company or anyone outside our company, or use inside information for your personal benefit or for the personal benefit of another person or entity.
- Do not use inside information to trade in securities or provide a related “tip” to a family member, friend or any other person.
- Prior to engaging in any securities transaction, consult all related policies issued by IHS Markit and contact trading.compliance@ihsmarkit.com with any questions you may have.
Be an expert ...

Material, nonpublic information (also known as “inside information”) is information about a company that is not known to the general public and that could influence a typical investor’s decision to buy, sell or hold that company’s securities (or other investment decisions related to that information). Below are some examples of nonpublic information that you may encounter in your role at IHS Markit:

- quarterly or annual earnings or sales
- the win or loss of a major customer
- changes in management
- major developments specific to an industry
- government or IHS Markit reports of economic trends or indices (e.g., housing starts, employment, PMI, etc.)
- major acquisitions or divestitures or other important corporate transactions

Delivering on our values

When we act with integrity, we demonstrate that there is no right way to do a wrong thing.

Go right to the source

For additional information, see the following policy:

- Trading securities
Social media and professional networking

Social media and professional networking sites provide excellent channels for colleagues to network and exchange information. We must all use common sense and good judgment when posting information online about ourselves or our company, understanding that what we post reflects on all of us.

**Put it into action**
- Review and comply with our social media usage policy.
- Be professional and respectful whenever you post online.
- Do not give the impression or appearance of speaking officially on behalf of IHS Markit, unless you are authorized to do so.
- Never share over social media or through social networking any confidential information about your work at IHS Markit.

**Be an expert ...**
Social media includes many different websites and applications where individuals can share and participate in social networking. Social media, of course, includes sites such as Facebook, Instagram, LinkedIn, Twitter and YouTube – but new social media applications are developed every day, and these guidelines apply to all of them.

**Delivering on our values**

**Integrity** is the basis of all of our actions – in person and online.

**Go right to the source**
For additional information, see the following policy:
- Social media usage
Media, government and public inquiries

Our stakeholders, including customers and investors, trust us to provide them with consistent and accurate information about our company and fields of expertise. For this reason, only designated IHS Markit representatives are permitted to communicate with the news media, investors and investment analysts on the company’s behalf.

**Put it into action**

- Contact corporate communications if you receive any media enquiries about IHS Markit or your work.
- If you’re speaking on behalf of the company, obtain approval from corporate communications prior to publishing materials, or giving or granting an interview, which identifies you as an IHS Markit employee.

**Be an expert ...**

- If a media representative, investor, customer or analyst contacts you about a company matter on which you are not authorized to comment, ask for the person’s contact information and the nature of the query, and then contact corporate communications.
- If you receive a request from a regulatory authority, government agency or official, contact the legal or corporate compliance department immediately and inform corporate communications.
Delivering on our values
We show our value of **partnership** through our cooperative and collaborative spirit.

**Go right to the source**
For additional information, see the following policy:
- Disclosure
We care about our people, our customers and our communities

Human rights

We are committed to conducting our business in a manner that respects the rights and dignity of all people. Through our commitment to responsible citizenship, IHS Markit supports and respects international human rights. We believe we can play a positive role in the communities where we operate. Our human rights and labor practices policy outlines our commitment to ensuring that our corporate practices foster respect and dignity in our communities and promote diversity and respect in the workplace.

Put it into action

- Zero-tolerance approach to forced labor and human trafficking, both within our organization and throughout our supply chain.
- Continued efforts to contribute to the promotion of human rights and to create a transparent, accountable and ethical business society.
- Status as a long-standing signatory to the World Economic Forum’s Partnering against Corruption Initiative.

Go right to the source

For additional information, see the following policies:

- Human rights and labor practices
- Modern slavery act statement
- Statement on modern slavery and human trafficking
Corporate sustainability

Corporate sustainability underpins our organization as a philosophy of best business practice including philanthropy and the environment. With an eye to the future, IHS Markit encourages every colleague to get involved and make a difference.

**Put it into action**

- Commitment to addressing material Environmental, Social and Governance (ESG) issues, which helps ensure that we are structured for long-term success in a changing business environment while helping our customers advance their sustainability strategies.
- Commitment to our communities by supporting not-for-profit organizations and causes through volunteering, as well as cash and in-kind donations.
- Commitment to advancing environmental stewardship including taking steps to reduce waste and mitigate the effects of climate change.

For more information, visit IHS Markit’s corporate sustainability web pages or contact the corporate sustainability team.
Who to contact

Remember that if you have questions or concerns, we are here to help. Contact any of these compliance people if you need guidance at any point:

- A local or regional human resources representative
- A local or regional legal representative
- The head of internal audit
- The chief compliance officer
- The chief people officer
- The general counsel
- The chief executive officer
- Our [compliance hotline](#)
Waivers and amendments

Any waivers of the provisions in this code for executive officers or board members may only be granted by the Board of Directors or a committee thereof and will be promptly disclosed to the company’s shareholders. Any waivers of this code for other colleagues may only be granted by our legal department. Amendments to this code must be approved by the Board of Directors or a committee thereof and will be promptly disclosed to our company’s shareholders when doing so is required by law or regulations.

Enforcement

We take the obligations described in our code very seriously. Our general counsel has primary authority and responsibility for enforcement of our code, subject to the supervision of our Board of Directors or a committee thereof. Any colleague, officer or board member found to have violated our code may be subject to disciplinary action, up to and including termination. Violations of the code that involve illegal behavior may be reported to the appropriate authorities.

Legal notice

IHS Markit reserves the right to revise this code and its corporate compliance program at any time. Nothing in this code constitutes a contract, promise or guarantee of continued employment. This code does not create any contractual or other rights for shareholders, suppliers or any other person.