



Code of Conduct

Version 2 | February 14, 2024



INTRODUCTORY LETTER FROM GENEVIEVE JUILLARD, CEO

At IDG we are trusted with the data of many of the world's largest and most recognized organizations. We take immense pride in treating that responsibility with the utmost of care and respect.

Organizations look to us to provide transparent, reliable, and actionable market intelligence through our IDC and Foundry subsidiaries. All of us at IDG are committed to acting with integrity and a dedication to excellence. The IDG Code of Conduct has been created to foster a workplace reflective of our principles as an organization and to create a solid foundation for ethical growth and scale in the future. It underscores our commitment to integrity, transparency, and ethical behavior across all facets of our global operations.

Please take time to read our Code of Conduct thoroughly. It is designed to guide every member of our organization, from executives to entry-level employees, in their daily activities. It is a testament to our belief that responsible business practices not only contribute to our long-term success but also positively impact the communities we serve. By adhering to these guidelines, we aim to foster an atmosphere where innovation thrives, partnerships flourish, and individuals are empowered to bring their best selves to work each day.

Genevieve Juillard
CEO, IDG

TABLE OF CONTENTS

INTRODUCTION4

- Our commitment to our integrity
- Your responsibility
- Speaking up
 - *Where to go for help*
 - *We do not tolerate retaliation*

PROTECTING OUR PEOPLE AND COMMUNITIES.....6

- Discrimination and harassment
- Office Safety
- Equal employment
- Protecting human rights
- In the community

FOSTERING TRUSTWORTHY BUSINESS PRACTICES.....10

- Money laundering and trade controls
- Conflicts of interest
- Promoting fair competition and fair dealing
- Anti-bribery and Anti-corruption
- Gifts and entertainment
- Trading on insider information
- Financial reporting

PROTECTING OUR CLIENTS AND OUR ASSETS.....16

- Record retention
- Use of company assets
- Confidentiality and information security
- Contracting

INTRODUCTION

OUR COMMITMENT TO OUR INTEGRITY

This Code of Conduct (“Code”) is the foundation of our commitment to our employees, customers and community. We hold ourselves to the highest standards, demonstrating, both through our words and our actions, the importance of acting in accordance with this Code, our policies and applicable law.

YOUR RESPONSIBILITY

All IDG employees must abide by and uphold the Code, and we expect our partners, vendors, and consultants to similarly comply with its principles. Each of us is personally responsible for:

- Reading and understanding this Code and IDG policies, and asking for guidance as needed by reaching out to compliance@idg.com.
- Acting in compliance with applicable laws, rules, and regulations everywhere we do business.
- Acting professionally and respectfully when interacting with others.
- Promptly raising any and all policy violations and supporting others who raise compliance concerns.
- Cooperating fully in any and all compliance investigations.

Our Code is a great resource, but it doesn’t cover every situation. You must use good judgment and common sense when making decisions, and ask for help when you need it. Be aware that anyone who violates our Code may face corrective action, up to and including termination of employment.

SPEAKING UP

Our success as an organization is built on a foundation of ethical decision-making and a commitment by every employee to uphold the highest standards of professional conduct on the job. We are all on the same team. The best way to sustain an ethical culture is for each of us to act with integrity every day — doing the right thing when it comes to our own behavior, being aware of what’s going on around us, and being willing to speak up when we see or suspect activity that could harm our organization.

Help us put integrity into action — your role on our team is to speak up if you know of or suspect any unethical behavior. Our role is to listen.



Where to go for help

You have several resources available to you to help navigate these ethical concerns, including this Code, policies available on Global Link, and other internal governance resources. If you have unanswered questions or need to report a concern or violation, you can use any of the follow methods:

- Your manager
- Your HR Business Partner or any other member of the Human Resources Department
- Any Legal or Compliance team member
- Compliance@idg.com
- The EthicsPoint Employee Hotline

EthicsPoint is a third-party hosted system, available 24/7, which allows for anonymous reporting in multiple languages via phone, web intake and QR code. The hotline number is country dependent. You can find more information on how to report in the **EthicsPoint** section on Global Link.

All concerns raised in good faith will be carefully reviewed, regardless of how it was reported. This may include conducting a fair, objective, and thorough investigation. Employees are expected to cooperate fully and truthfully in any and all compliance investigations.

If we determine that a violation occurred or someone was untruthful in the course of an investigation, we may take appropriate action, including disciplinary action up to termination and, if necessary, referral to law enforcement.

For more information on available resources and anonymous reporting options, including local EthicsPoint phone numbers, visit **EthicsPoint** on Global Link.

We do not tolerate retaliation.

We know it takes courage to share your concerns. We will not tolerate retaliation against anyone because they raise a concern in good faith or participate in an investigation.



Your voice matters! By speaking up, you are living our values, supporting your colleagues, and maintaining our reputation as a trusted partner.

PROTECTING OUR PEOPLE AND COMMUNITIES

IDG is committed to fostering a safe, diverse, and inclusive workplace where every individual is treated with respect, dignity, and fairness. Our commitment to respecting others encompasses a broad range of principles, including equal employment, non-discrimination, office safety, and the protection of human rights.

DISCRIMINATION AND HARASSMENT

We expect all individuals to respect the rights and dignity of others and to treat them with fairness and equality. Any form of discrimination or harassment based on a person's race, color, religion, sexuality, gender identity or expression, national origin, disability, age, veteran status, or any other characteristic protected by law, is strictly prohibited.

Discriminatory behavior is any unwelcome verbal, visual, physical or other conduct of any kind that causes others to feel uncomfortable or creates an intimidating, offensive, or hostile work environment.

Examples of discriminatory behavior:

- Using epithets or slurs, or making derogatory comments or similar types of remarks.
- Making jokes about a person, no matter how light-hearted the intention.
- Negative stereotyping.
- Threats, intimidation, or hostile acts that create an uncomfortable or hostile work environment.
- Comments or written or graphic material that disparage or show hostility or aversion.
- Unwelcome propositions, demands, or advances of a sexual nature.
- Unwelcome physical contact such as touching, hugging, kissing, grabbing, patting, or pinching.
- Inappropriate remarks about a person's appearance.
- Vulgar or obscene gestures, even if said or made jokingly.



OFFICE SAFETY

The safety and well-being of our colleagues are of paramount importance. We are committed to providing a safe and secure working environment for everyone. To achieve this, we expect all colleagues to adhere to office safety and security procedures, and to take responsible actions to prevent accidents and promote a culture of safety.

Drug-free environment:

- Our workplace is a drug-free environment. You are expected to perform your job duties free from the influence of any substance that could impair job performance.
- The use, possession, distribution, or sale of illegal drugs or unauthorized prescription medications is strictly prohibited. These rules apply to all colleagues, at all times, whether on or off IDG premises.
- While colleagues of legal age may consume alcohol in moderation at company-sponsored events, do not pressure or encourage others to consume alcohol.

Violence-free environment:

- All forms of violence, threats, intimidation, or harassment are strictly prohibited in our workplace. This includes but is not limited to physical violence, verbal abuse, and any other aggressive behavior.
- Be aware of your surroundings when entering or exiting access-controlled facilities to prevent individuals without proper authorization from entering behind you.
- All colleagues have an obligation to report threats, potential violence, or other suspicious activity immediately.
- You may not possess a weapon of any kind, or other dangerous or hazardous device or substance on IDG premises, at IDG-sponsored functions, or at work-related settings.



EQUAL EMPLOYMENT

We are dedicated to providing equal employment opportunities for all individuals, including in recruitment, hiring, training, promotion, compensation, and all other employment practices. We will take affirmative action to promote diversity and inclusion in our workforce.

What are your responsibilities?

- Participate in fair and inclusive recruitment, hiring, and promotion practices.
- Identify and report any barriers that hinder equal employment opportunities or inclusion within the workplace, and support efforts to eliminate them.
- Engage in open, respectful communication with colleagues and support efforts that promote inclusion.
- Actively listen to colleagues, ensuring that their ideas and concerns are acknowledged and integrated into decision-making processes.

PROTECTING HUMAN RIGHTS

IDG is committed to upholding and protecting the fundamental human rights of all individuals, both within our organization and throughout our supply chain. We strive to provide a safe, diverse and equal opportunity workplace. Any practices of modern slavery either within our company or within our supplier or partner organizations will not be tolerated.

We support:

- A workplace free of discrimination and harassment.
- A workplace free of child labor, forced labor, and human trafficking.
- Fair and equitable wages, benefits, and other conditions of employment in accordance with local laws.
- Colleagues' right to freedom of association and collective bargaining.
- Safe and healthy working conditions for colleagues.



If you suspect or become aware of any violations of human rights or instances of modern slavery, it is your duty to report it promptly to your supervisor, Human Resources, or Compliance.

IN THE COMMUNITY

As global citizens we have a duty to behave responsibly in the communities in which we operate. IDG empowers our colleagues to give back where they live and work, and is proud of the positive change IDG colleagues have on their communities.

We support sustainability by:

- Understanding environmental issues and how fiscal responsibility is essential to our environmental future.
- Using our platforms and position in the IT industry to promote sustainability.
- Minimizing air travel, use of materials and energy consumption in our offices and business practices.
- Developing and maintaining a working model that efficiently uses our office space.

We support giving back by:

- Utilizing global Give Back Volunteer Days.
- Participating in IDG-organized charity events.



Unless you receive approval in advance, please do not use or donate company funds or assets to further your personal volunteer activities.

FOSTERING TRUSTWORTHY BUSINESS PRACTICES

At IDG, we hold integrity in the highest regard and expect every colleague to uphold this principle in all business activities. We are committed to complying with all applicable laws and regulations, maintaining the highest ethical standards, and living up to our reputation as a trusted partner to our customers, suppliers, and community.

MONEY LAUNDERING AND TRADE CONTROLS

As a global business, we have a duty to ensure our business practices comply with numerous financial laws, rules, and regulations. Compliance benefits all of us by creating a transparent, secure, and ethical financial environment.

Trade sanctions:

- Sanctions restrict our ability to do business with particular countries, entities, or individuals. You must not do business with any person or entity that is a sanctioned party or in a sanctioned market, or owned, controlled or acting on behalf of a sanctioned party or a party in a sanctioned market.
- Sanctions can change rapidly so it is important to consult with our sanctions resources, including our **Sanctions Policy** on Global Link.

Money laundering:

- Money laundering is the process by which people or companies try to conceal illicit funds or try to make these funds look legitimate. We do not condone, facilitate, or support money laundering in any business practice.
- Signs of potential money laundering include irregularities in the way payments are made such as cash payments, using a currency different than the invoice, or payments to or from countries or entities not related to the transaction. You must be vigilant of deals that don't reflect a real business purpose or with third parties that have not been vetted.



CONFLICTS OF INTEREST

IDG expects that you will act in an honest and ethical manner and avoid conflicts of interest by exercising sound judgment and making reasoned and impartial decisions. All colleagues are expected to conduct their business affairs with the highest standards of integrity, so that no conflict of interest exists or can be reasonably implied or construed to exist. IDG reserves the right to address conflicts in the manner that most benefits our company, such as modifying supervision or job obligations.

Examples of conflicts include:

- Having an outside job or affiliation at a competitor, customer or supplier of IDG, or that otherwise materially interferes with your availability to do your job at IDG effectively or objectively.
- Using information, property or corporate opportunities gained through your role for personal benefit.
- Supervising or working closely with a family member, spouse, or close friend which may compromise fairness and objectivity.
- Using your position or influence to hire or promote a family member or a close associate without considering other candidates fairly.
- Having a material financial interest in a competitor, customer, or supplier of IDG (either you or a close relative).
- Directing business to a supplier owned or managed by, or which employs, a relative or friend.

What are your responsibilities?

- Identify potential conflicts of interest. If you aren't sure, start by asking yourself:
 - Does my participation interfere with my ability to do my job or make a sound business decision?
 - Does, or could it look to others that, my personal interests or relationships are influencing the decisions I make?
 - Do I, my family or close friends stand to personally benefit from my involvement?
 - Am I putting my own interests ahead of IDG's interests?
 - Am I using IDG resources or assets (including time) for other purposes?
- Promptly disclose a potential conflict of interest using the **Conflicts of Interest Disclosure Form** on Global Link. IDG will assess the disclosed conflict of interest on a case-by-case basis.



A conflict of interest is any activity or personal interest that interferes with your ability to make impartial and objective decisions in the best interests of IDG.

PROMOTING FAIR COMPETITION AND FAIR DEALING

IDG wins and maintains customer relationships by providing essential products and services using high-quality data and tested methodologies. We compete spiritedly but fairly, maintaining ethical practices in our interactions with competitors, clients, and partners that uphold the law and our reputation.

Working with competitors:

- Avoid sharing or receiving commercially sensitive information.
- Never agree with our competitors to set prices or contract terms or to divide or allocate markets, geographic territories, customers, or suppliers.
- Do not induce others to breach a contract in order to enter into an agreement with IDG.
- Avoid any communication that could be construed as encouraging anti-competitive behavior or disparaging third parties.

What are your responsibilities?

- You are free to gather competitive intelligence from public sources of information such as websites, published articles, and public presentations.
- Do not misrepresent your identity or relationship with our business to gain access to a competitor's product.
- Do not use information if doing so would violate confidentiality obligations.
- Comply with our [Social Media Policy](#) in connection with your use of the internet or any social media sites.

Competing Fairly:

- Avoid using aggressive, hyperbolic, or speculative language.
- Do not make false, misleading, or inaccurate statements about our products or those of our competition.



Violations of antitrust or competition laws may result in severe legal penalties for our company and criminal charges for the individuals involved. Competition laws are complex and vary by country. Please consult Compliance for guidance. If you suspect an antitrust violation, speak up and report it!

ANTI-BRIBERY AND ANTI-CORRUPTION

The United States and most every country in which IDG operates have laws and regulations that strictly prohibit bribery and other illicit payments. Any attempt to pay, authorize, or promise a bribe, kickback, or any other form of corrupt payment is strictly prohibited.

What are your responsibilities?

- Never offer, promise or give anything of value to anyone in order to get business or influence decision-making. It does not matter if the intended recipient is public or private, conducts business in a country where paying bribes is “necessary to get anything done,” or “ingrained in the business culture” even if “everyone else is doing it.”
- Record all transactions accurately and with sufficient detail to identify the actual purpose for each payment. “Off-the books” accounts or payments, or making any false, misleading, or incomplete entries in our books and records in an attempt to obscure the actual purpose of a payment, is strictly prohibited.
- Look out for ‘red flags’ and promptly report any suspected bribery, demands for a bribe, or the actual payment of a bribe.

Red flags to look out for:

- Payments that are not adequately documented or explained, especially when they involve individuals or entities in high-risk regions.
- Undisclosed or off-the-books payments, commissions, or fees in exchange for business favors or advantages.
- Requests or demands to use a specific third party, particularly where they lack qualifications or resources to perform real work.
- Requests for payments to a government official to expedite non-discretionary actions or services.
- Extravagant gifts, entertainment, or hospitality that could be perceived as attempts to influence decisions.



GIFTS AND ENTERTAINMENT

Gifts, meals, services, and entertainment are a customary part of business relationships and can play a role in enhancing goodwill and rapport with clients, partners, and stakeholders. However, they also require thoughtful consideration and adherence to ethical standards to avoid any real or perceived attempt to inappropriately influence business decisions or gain an unfair advantage.

What is considered an acceptable gift?

- Gifts are generally infrequent and not excessive in value.
- Gifts do not place the recipient under any obligation.
- Gifts should not be cash or cash equivalents (e.g. gift cards).
- Gifts should be consistent with local business practices, customs, and laws, as well as the applicable customer's or partner's own policies and guidelines.
- Gift should not embarrass or give the appearance of impropriety if publicized (e.g., gifts provided during or close to contract bids or renewals).

Special rules for government officials:

- Additional restrictions apply to gifts made to government officials. You should not give any gift to a government official without approval from Compliance.

TRADING ON INSIDER INFORMATION

As part of your employment, you may have access to material, non-public information about us, a customer or another third party, or the markets in general. It is illegal to trade on material non-public information, or to provide that information to another person so that they may trade on it.

What is material non-public information?

- Any information about our company, or companies with which we work, that isn't known by the public but, if it was, might influence someone to buy, sell or hold stock.
- Some examples of material information include:
 - Changes to senior management
 - Mergers, acquisitions, or divestures
 - Significant new product announcements
 - Security risks or vulnerabilities
 - Actual or threatened litigation, or the resolution of litigation
 - New or lost major contracts, orders, suppliers, customers, or financial sources



You must not give, or must return, any gift that would violate this Code and must report any gift in excess of \$150 USD (or local equivalent in purchasing power)

Don't trade on material inside information, and don't tip others (including your family and friends) so they may trade!

FINANCIAL REPORTING

We have a responsibility to ensure that our corporate records and communications are complete, reliable, and accurate, as our financial and accounting records are used to produce reports for our management teams, directors, and shareholders. Failing to comply with applicable laws and policies, falsifying, misrepresenting, omitting, or concealing any facts or information in our business records, including encouraging others to do so, or facilitating or participating in the financial misconduct of any third party with whom we do business, will result in disciplinary action up to and including termination of employment.

What are your responsibilities?

- Ensure your records, including time sheets, sales records, invoices, bills, and expense reports, are complete, accurate, and reliable.
- Comply with accounting policies and internal control requirements.
- Avoid exaggeration, guesswork, or legal conclusions in our records and communications.
- Record transactions in a timely manner. “Off-the-books” transactions, funds, or assets should never be kept for any reason.

Red flags to look out for:

- Forgeries or other alterations of documents.
- Billings made higher or lower than normal prices for products or services at a customer’s or vendor’s request.
- Payments made for any reason other than as described in the relevant contract.
- Payments made through intermediaries that deviate from ordinary business transactions.
- Embezzlement, theft, or misappropriation of assets in our control.



If you become aware of or suspect any fraud, misrepresentation, reporting inaccuracy, or violation of accounting or internal control requirements, immediately report it!

PROTECTING OUR CLIENTS AND OUR ASSETS

IDG recognizes the intrinsic value of our assets and those of our customers and partners, and is dedicated to protecting intellectual property and confidential information within our control from misuse, damage, loss, misappropriation, theft, destruction, or infringement.

RECORD RETENTION

It is important that we keep records for an appropriate length of time. Legal requirements, accounting rules, government agency requirements, and other external sources may specify the appropriate retention periods for certain types of records, and employees responsible for such records must understand the requirements. Moreover, if requested by the Legal Department to retain certain records relevant to a litigation, audit, or investigation, you must do so until the Legal Department tells you retention is no longer necessary.

What are your responsibilities?

- Ensure record maintenance in whatever media satisfies legal, fiscal, regulatory, and operational requirements.
- Properly dispose of records no longer of value, both in paper and electronic format.
- Comply with all litigation holds instituted by the Legal Department.
- If you have any questions regarding the correct length of time to retain a record, contact the Legal Department.



USE OF COMPANY ASSETS

IDG assets include everything that our company owns or uses to conduct business, including physical and electronic assets. You should only use IDG assets for authorized business purposes and only access systems and information that you are authorized to access. We recognize that you may make occasional personal use of assets such as phones, computers, email, and the Internet; however, such use should not interfere with work (yours or anyone else's) and must not violate our policies or the law.

You should not assume or expect any personal privacy when using IDG assets. Remember we may monitor your use, and any data or content you create, transmit, or store using our systems and networks is the property of IDG where allowed by local law.

What are your responsibilities?

- Proofread all email messages before sending.
- Consider each recipient of an email, including those in Cc and Bcc, and be cautious of 'reply all'.
- Comply with terms which appear on any internet site or service you access using IDG systems.
- Report any property or equipment that is damaged, unsafe or needs repair.
- Stop using and return any and all IDG assets in your possession upon termination of employment.
- Follow guidance from our IT Security team and comply with all **IT Security Policies** on Global Link.

What should you avoid?

- Don't install unauthorized software, applications, hardware or storage devices on your computer, or access our network through unauthorized applications or devices.
- Don't open suspicious links in emails, even if you know the source.
- Don't access, send or download inappropriate content.
- Don't use your personal email to transmit IDG's information or in the performance of your business obligations.
- Don't leave your device unattended or otherwise accessible.
- Don't share your computer user IDs, passwords and authentication devices.

In some circumstances, you may be allowed to use personal smartphones or other devices for business purposes. All use of your personal device must comply with IDG's bring-your-own-device policies. These devices will be subject to the same security and data management practices as a company-owned device.



If you become aware of loss, theft, or misuse of confidential information you must report it immediately!

CONFIDENTIALITY & INFORMATION SECURITY

As a part of your role, you may have access to proprietary intellectual property or learn confidential information about IDG, our customers, suppliers, and others that is not available to the general public. Confidential information and intellectual property represent the outcome of significant company investment and years of hard work. Improper use or disclosure of such information could put us in a competitive disadvantage or otherwise damage our reputation.

How should confidential information be managed?

- Do not share information with customers, vendors, or partners, including colleagues, unless there is a legitimate “need-to-know” and you are authorized to do so.
- Always consider whether you are authorized or should have access to confidential information.
- Reconsider your right to access, use or disclose confidential information when the purpose of using that information changes.

Protection of personal data:

- Many countries have data protection and privacy laws that govern the collection, use, retention, and transfer of personal data. All access and use of personal data must be in compliance with our **privacy policy** and applicable data protection laws.

Information security practices:

- Ensure the physical security of hardware that’s assigned to you, and do not store IDG information on personal devices or external hard drives.
- Use unique, strong passwords and protect those passwords (e.g., not sharing passwords with others or other systems, using a password manager).
- Be diligent when looking for signs of phishing or malicious intent.
- Use secure communication channels when transmitting confidential information and be cautious with public Wi-Fi.
- Be aware of your environment before discussing confidential information, especially in public or open places including the Internet.
- Maintain a “clean desk” including locking computers when you step away, properly storing paper documents with private information, and shredding outdated documents.
- Comply with all **IT Security Policies** set forth by our IT Security team.
- Continue to protect our confidential information even after you leave the company, and return any confidential materials in your possession when you depart.



CONTRACTING

Contracts are an essential part of business, managing financial transactions, ensuring compliance with laws and regulations, and contributing to the establishment of trust in business relationships. Our colleagues, contractors, and affiliates are expected to uphold the highest standards of integrity throughout the entire contracting process, including complying with internal policies and procedures governing the negotiation, execution, and fulfillment of contracts.

What are your responsibilities?

- Ensure you have obtained all required approvals and legal review.
- Do not sign a contract unless you are an authorized signatory.
- Use approved contract templates and adhere to contract obligations, including confidentiality obligations, reporting requirements, and other contract terms.
- Do not enter into any “side letters” that permit deviation from our contract terms. All terms must be contained in the formal contract.

Governments contracts:

- If you engage with governments, you must follow the rules which govern public procurement, comply with applicable laws, and comply with IDG’s policies on government contracting available on Global Link.



For more information please see our Approval and Signature Policy available on Global Link