

S&P Global

Title	Global Human Rights Policy
Effective Date	February 24, 2016
Update Date	March 1, 2022

1.0 Introduction

1.1 Policy Statement

As part of its mission to promote sustainable growth, S&P Global, Inc., including its subsidiaries and Divisions (collectively “the Company” or “S&P Global”), is committed to responsible and transparent operations that demonstrate respect and support for all Human Rights.

This Global Human Rights Policy (“Policy”) formalizes our commitment and communicates our values and expectations with respect to ethical conduct in the workplace and the communities at large where we do business, in accordance with applicable human rights and labor laws. The Policy also outlines our approach to effective and diligent procurement practices by continually augmenting our procedures and prioritizing vendors that uphold the same level of Human Rights standards.

We believe this Policy reflects the fundamental operating principles for conducting business, provides a critical layer of protection of Human Rights across our business, and enables the Company to identify and manage its Human Rights impacts, mitigate risks, and maximize opportunities for Human Rights.

1.2 Relevant Definitions

Defined terms are intended to provide further clarity regarding this Policy. Defined terms will appear in initial capital letters. See Appendix A: List of Relevant Definitions.

1.3 Scope of Policy

This Policy applies globally to all directors, officers, employees, and contractors of S&P Global. This Policy also applies to our upstream and downstream supply chain through vendors, suppliers, or any other third-party partners working or engaged on the Company’s behalf.

This Policy is not intended to cover every possible law or situation. Employees are expected to be thoughtful before making decisions and to always use their best judgment.

2.0 Frameworks and Principles

S&P Global supports the principles contained within the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises (Chapter IV: Human Rights) and the ILO Eight Fundamental Conventions. S&P Global recognizes the duty of governments to safeguard Human Rights and the responsibility of businesses to respect Human Rights. S&P Global actively participates in the UN Global Compact and we are a signatory to the UN Women Empowerment Principles.

To comply with the U.K. Modern Slavery Act 2015, S&P Global releases a statement each year to identify the

policies, systems, and measures for preventing Modern Slavery or other forms of Human Rights violation within our operations and supply chain. This annual statement can be found under the [Corporate Responsibility](#) section of our website.

3.0 Human Rights Considerations in Our Operations

S&P Global's [Code of Business Ethics \(COBE\)](#) underscores our core values and guides everything we do by informing our decisions, driving actions, and determining how we conduct business. Each year, we ask all employees to complete an annual training, read the COBE document and affirm the Affirmation Statement. In addition, we regularly supply additional training and updates to all global staff on health, safety and environmental matters as well as compliance with specific personal information and privacy and diversity, equity and inclusion (DEI) issues.

3.1 No Human Trafficking

S&P Global has a zero-tolerance approach to Modern Slavery and we are committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our business or in any of our supply chains. See also our [Modern Slavery and Human Trafficking Statement](#).

3.2 No Forced Labor

S&P Global does not permit the use of any form of forced or compulsory labor, such as prison labor, indentured or bonded labor, trafficking or serfdom.

3.3 No Child Labor

S&P Global abides by local minimum age laws and does not use or condone child labor in any form or circumstance.

3.4 Rights to Health and Occupational Safety

S&P Global is committed to ensuring the health and safety of our employees, customers, and other third parties. In line with the Company's Health, Safety and Environmental Policy, risk assessments are a core approach to evaluate hazards in our operations and minimize the level of risk by initiating control measures as necessary. Our functional leadership in this regard will ensure compliance with this commitment in every location and facility in which we operate.

3.5 Rights to a Sustainable Operating Environment

S&P Global's efforts to promote a sustainable environment encompass our operations and people. We continually assess our portfolio and business operations with sustainability in mind and implement programs to reduce the Company's global environmental impact, while also promoting accountability through transparent public disclosure of our reduction efforts.

3.6 Rights to Equality and Non-discrimination

S&P Global commits to treating its employees with respect, dignity and care. Employees may not discriminate against or harass any other employees based on race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, pregnancy, veteran status, health status, genetic information, citizenship status or any other basis prohibited by applicable law. S&P Global prohibits all such discrimination and harassment. In addition, S&P Global is committed to equal employment opportunity at all levels of employment, including at the executive level.

3.7 Rights to Privacy Protection

S&P Global maintains high data protection standards to protect the rights of individuals and to determine how their personal information may be used. Our approach is reflected in our privacy policies for employees (see Employee Privacy Policy (U.S., India and Pakistan) and Employee Privacy Policy (excluding U.S., India and Pakistan)) and our commitment to the need to honor our customers' right to privacy, as laid out in the Company's [Global Corporate Privacy Policy](#).

3.8 Rights to Freedom of Association

S&P Global supports our employees' rights to engage in protected labor activities. Employees may do so without disclosure to the Company, and the Company will not retaliate against employees for engaging in such activities.

3.9 Rights to Fair and Equal Remuneration

S&P Global compensates employees competitively relative to the industry and is committed to compliance with all applicable local laws governing employee wages and benefits.

4.0 Human Rights Considerations in Our Supply Chain

Being a purpose-led organization, S&P Global commits to building sustainable relationships with its vendors and suppliers to mitigate any potential adverse impact on Human Rights. To deploy responsible procurement for the Company, risk management processes focused on both our operations and supply chain have been established to assess and monitor adherence to this Policy.

5.0 Risk Assessment

S&P Global endeavors to identify, assess and mitigate potential and actual Human Rights impacts resulting from its business activities, both in its own operations and the relationships connected to those activities. Procedures and tools for the identification, assessment and mitigation of Human Rights risks are applied and integrated into standard risk, compliance and operational processes.

- **Our Operations:** At S&P Global, DEI are part of our culture and are at the heart of who we are as an organization. We undertake a People First approach to our overall employee benefits package, which includes compensation, benefits, recognition, wellbeing, continuous learning, and career development. S&P Global adheres to the practice of recruiting and treating all personnel without regard to any of the listed characteristics under Rights to Equality and Non-discrimination. All S&P Global personnel have an obligation to contribute to a harassment- and discrimination-free workplace. We apply people and language analytics to reduce unconscious gender bias in workforce management processes, such as in job descriptions. In addition, S&P Global conducts a global employee engagement survey on a periodic basis to better understand the expectations of employees in their work environment, which assesses the Company's organizational health and highlights any emerging equality risks.
- **Our Supply Chain:** Our Enterprise Vendor Risk Management (VRM) Program is built to identify, assess and mitigate risks associated with vendor practices covering areas including ethical business conduct, human and labor rights, the environment, data privacy, health and safety and vendor diversity. Such risks are encompassed in our Materiality Assessments, Engagement Risk Assessments, and Vendor Control Assessments of the vendors to ensure adherence to Company policies and standards. We have also embedded standards into our procurement activities and bind our vendors to these standards. Compliance with S&P Global's standards is assessed as part of our Procurement Sustainability Audit Program, managed by the Global Sourcing & Procurement Department. Please refer to the Vendor Code of Conduct for further guidance.

6.0 Policy Violations

6.1 Restricted Activities

S&P Global maintains a zero-tolerance policy for human rights violations, such as those established in the UN Universal Declaration of Human Rights. S&P Global will not conduct business with any vendor, business partner, or other third party who violates this Policy.

6.2 Violations of this Policy

S&P Global takes this Policy seriously. For employees, failure to comply with this Policy may result in disciplinary action, up to and including termination of employment. For vendors, business partners, and other third parties, penalties for violations of this Policy, may include temporary sanctions, termination of an S&P Global account, or other applicable punitive actions.

6.3 Access to Remedy

Where a company has caused or contributed to an adverse Human Rights impact, the UN Guiding Principles on Business and Human Rights state the company should provide for or cooperate to remedy these impacts. S&P Global supports this statement and will endeavor to effectively remedy such an impact through the use of legal action or judicial procedures, collaborative forums and company grievance mechanisms as set out in our COBE, Vendor Governance Policy and Vendor Code of Conduct. S&P Global prohibits retaliation against any individual who lodges a grievance or concern and expects our business partners to do the same.

7.0 Reporting Obligations

If you become aware of or have suspicions about any actions that are in conflict with this Policy, or attempts to circumvent any part of this Policy, please immediately notify your manager, the Legal Department, or Compliance. Additionally, you may report a violation or suspicion of a violation online or by phone through the Company's anonymous [EthicsPoint Helpline](#). The helpline is open to any employee, contractor, vendor, or material stakeholder.

8.0 Related Reference Documents

Additional guidance is available in related documents as follows. Internal policies are available on the Company's intranet for authorized users.

- [S&P Global Code of Business Ethics \(COBE\)](#)
- [S&P Global Global Corporate Privacy Policy](#)
- [S&P Global Modern Slavery and Human Trafficking Statement](#)
- [S&P Global Health, Safety and Environmental Policy](#)
- [S&P Global Employee Privacy Policy \(U.S., India and Pakistan\)](#)
- [S&P Global Employee Privacy Policy \(excluding U.S., India and Pakistan\)](#)
- [S&P Global Vendor Governance Policy](#)
- [S&P Global Vendor Code of Conduct](#)

9.0 Contact Names for Further Information

Inquiries or further information regarding this Policy may be directed to SPGlobalPolicies@spglobal.com or CR@spglobal.com.

Last Reviewed March 2022

Appendix A – List of Relevant Definitions

For those terms whose definitions are adopted, in part or as a whole, from other sources, original sources are provided.

Term	Definition
Human Rights	Human rights are the fundamental standards of treatment to which all people are entitled. The most widely recognized definition is the Universal Declaration of Human Rights, adopted by the UN. Although human rights are principally the responsibility of national governments, this has become an increasingly important issue for businesses (Link).
Modern Slavery	Adopted from the U.K.'s Modern Slavery Act 2015. Modern slavery covers an array of issues including human trafficking, child labor and cases of debt bondage. The Act stipulates that an annual statement be published if a company has sales of more than £36 million and if some or all of its business is in the U.K. (Link).
Human Trafficking	The recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs (Link).
Forced Labor	Work that is performed involuntarily and under the menace of any penalty. It refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities (Link).
Child Labor	Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that: is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work (Link).