

Vendor Code of Conduct

I. PURPOSE

The Gallup brand is built on honesty, trustworthiness, and integrity and Gallup upholds the highest standard of ethics in conducting its business. To maintain this high standard, it is critical that Gallup only partner with subcontractors and vendors (“Vendors”) whose ethics, policies, and business practices align with or exceed our ethical expectations, practices, and minimum requirements.

Vendors are required to meet or exceed the ethical standards set forth in this Vendor Code of Conduct. The Vendor Code of Conduct strives to promote a safe and healthy work environment by treating employees with respect and by complying with all applicable laws and regulations.

II. VENDOR STANDARDS

Gallup requires that all Vendors adhere to the following minimum requirements:

a. Compliance with Applicable Laws, Regulations and Company Policies

Vendors are expected to comply with all laws and regulatory requirements applicable to their business in the jurisdictions in which they operate including, but not limited to, legal requirements related to wages, hours, labor, health, safety, environment, immigration, import/export, and business practices or ethics. Vendors are also expected to comply with this Gallup Vendor Code of Conduct and violations are understood to constitute a material breach.

b. Discrimination

Gallup prohibits Vendors from discriminating against their employees based on any legally protected status or attribute that does not relate to their employment or their ability to perform tasks related to their job. Vendors also agree to timely investigate and resolve reports of discriminatory behavior.

c. Harassment

Gallup will not tolerate Vendors engaging in any sort of harassment based on any legally protected status or any other immutable personal characteristics that do not relate to a person’s employment or ability to perform their job. Vendors also agree to timely investigate and resolve reports of harassment.

d. Health and Safety

Vendors will provide a safe and healthy work environment for their employees. Vendors will adhere to all safety and health laws, rules, and regulations applicable to their particular industry and will take affirmative steps to mitigate worker safety and health hazards.

e. Child Labor

Gallup condemns the use of child labor and does not and will not accept goods or services from its Vendors produced by child labor as defined by local law, but in no event shall it involve the labor of children younger than fifteen years of age. Gallup also requires that all Vendors adhere to all applicable child labor laws and regulations.

f. Forced Labor

Gallup condemns the use of involuntary labor and does not and will not accept goods or services produced by its Vendors which uses forced labor, indentured labor, prison labor, or any other form of involuntary labor. Gallup also requires that all Vendors, along with their subcontractors, adhere to all applicable labor laws and regulations.

g. Compensation and Working Hours

Vendors are expected to comply with all applicable wage and hour labor laws and regulations governing employee compensation and working hours. If no minimum wage law applies, Vendors shall pay employees the prevailing industry wage. Gallup will not use Vendors who require employees to work in excess of the statutory requirements without proper compensation as required by applicable law.

h. Environment

Gallup requires that all Vendors conduct themselves in a manner that minimizes the impact of their activities on the environment, including complying with all applicable environmental laws and regulations, minimizing waste and emissions, and promoting recycling amongst its clients and suppliers.

i. Conflict of Interest & Gifts and Gratuities

Gallup requires that Vendors avoid interactions that may result in, or give the appearance of, a conflict of interest. This includes, but is not limited to, the giving or receiving of gifts, favors, personal services, special treatment or any other action that would give rise to an actual or perceived conflict of interest. Vendors must also prohibit its employees and subcontractors from giving any gift, service or thing of value to anyone if doing so would cause the recipient to violate the law or the rules and policies of the recipient's employer.

j. Accurate Records

Vendors are responsible for preparing and keeping accurate records and retaining all records per the terms of their agreement with Gallup or applicable laws and regulations. Falsification of records is also strictly prohibited.

k. Anti-Corruption and Bribery

Gallup requires that Vendors comply with all anti-corruption laws and regulations. This includes but is not limited to, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, both of which apply globally, as well as all other anti-bribery and anti-corruption laws when dealing with domestic and foreign government officials. Vendors shall not engage in bribery, collusion, offer promises, or use any other improper methods to obtain business or influence any government official to obtain an advantage on Gallup's behalf or in connection with any Gallup work order.

l. Intellectual Property

Gallup has developed strict standards to maintain impartiality, protect the confidentiality of our respondents, govern the release of data, and govern the use of our brand. Vendors are required to uphold these same standards. Gallup requires its Vendors to take steps to protect Gallup's intellectual property from intentional or unintentional unauthorized use, change, destruction, or disclosure.

Each Vendor must be vigilant in protecting Gallup's brand and products, including but not limited to, trademarks, trade secrets, research, hardware, software, codes, intellectual property, tangible property,

consumables, equipment, and supplies. Gallup prohibits the discussion or disclosure of confidential information such as customer list, financial information, labor relations strategies, or marketing strategies to individuals or organizations as a Gallup Vendor.

Vendors shall not disseminate or disclose any confidential information to any person or organization associated or not associated with Gallup at any time during or after contracting, without the express written consent of Gallup's General Counsel.

m. Security and Confidentiality

Vendors shall not disclose any sensitive information, trade secrets, intellectual property, customer information, or employee information. Vendors shall comply with all applicable laws and regulations governing the security and confidentiality of information received from Gallup or while doing business with Gallup. Gallup also requires Vendors to take steps to safeguard and protect any private or sensitive information they have attained while doing business with Gallup.

n. Drug Abuse Policy

Vendors shall not permit their employees or contractors to possess, use, sell, or keep illegal drugs in the workplace. Drug use may pose serious safety, health, or security risks, not only to the user but also to those who work with the user and should not be tolerated.

o. Safety and Violence Prevention

Gallup requires that Vendors maintain a safe work environment and take steps to prevent workplace violence. All threats of violence or actual violence, both direct and indirect (such as bomb threats), should be reported as soon as possible. Vendors shall investigate all threats, actual violence, suspicious individuals, or suspicious activities and deal with them in a timely and appropriate manner to promote workplace safety.

p. Non-Retaliation

Gallup requires Vendors to not retaliate against any employee or subcontractor who makes a good faith report of waste, fraud, abuse or other violations of this Code or law.

q. Gallup Equipment

Gallup supplied equipment, which may include phones, computers, tablets, and wireless internet hotspots, is to be used for Gallup's business purposes only. Gallup reserves the right to monitor Vendor activity on these devices and networks and will confiscate or demand the return of equipment that is used in violation of this Code.

r. Business and Travel Expenses

Gallup will reimburse Vendors for pre-approved reasonable business and travel expenses incurred while on assignment on behalf of Gallup if permitted by the Vendor's agreement with Gallup. Business and travel expenses will only be reimbursed if they are pre-approved or otherwise authorized by the applicable work order, the expenses are reasonable, the expenses are adequately documented and the reimbursement request is otherwise submitted in accordance with the work order (e.g., submission within a certain time period).

For questions or guidance on travel procedures or policies pertaining to expense reports, travel arrangements, reimbursement for specific expenses, please contact your Gallup point of contact for further clarification.

III. Reporting Violations

Gallup provides an Ethics and Compliance Helpline for raising questions, seeking guidance, and reporting ethics and compliance issues. The Ethics and Compliance Helpline and website information shall be provided to Vendor's employees in order for questions and concerns to be attended to. The Ethics and Compliance Helpline can be reached by dialing toll-free, within the United States, Guam Puerto Rico and Canada: **800-288-9439**. The helpline is available 24 hours a day, seven days a week. To file a report online visit gallup.ethicspoint.com.

William Kruse
General Counsel
Chief Compliance Officer