

Title	<b>Equal Employment Opportunity and Affirmative Action Policy (U.S. Only)</b>
Effective Date	<b>January 24, 2017</b>

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## **Introduction**

S&P Global has implemented the following policies and procedures as part of its longstanding commitment to compliance with all applicable equal employment opportunity and affirmative action requirements.

## **Equal Employment Opportunity Policy**

It is the policy of S&P Global to ensure equal employment opportunity without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, pregnancy, veteran status, genetic information, citizenship status, or any other basis prohibited by law. The Company is committed to equal employment opportunity at all levels of employment, including the executive level. This policy applies to all employment practices including but not limited to recruitment, hiring, employment, assignment, training, compensation, benefits, demotion or transfer, promotions, disciplinary action and terminations.

S&P Global likewise is committed to maintaining a work environment that is free from any and all forms of unlawful discrimination and harassment. It is therefore the Company's policy to prohibit discrimination and harassment against any applicant, employee, vendor, contractor, customer, or client on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, pregnancy, veteran status, genetic information, citizenship status, or any other basis prohibited by law. It is also the Company's policy to prohibit any and all forms of retaliation against any individual who has complained of harassing or discriminatory conduct, or participated in a Company or agency investigation into such complaints. The Company also provides reasonable accommodation of disability, religion and pregnancy in accordance with applicable laws.

## **Affirmative Action Policy**

S&P Global is also a federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("Section 4212") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). As such, the

Company is committed to taking positive steps to implement the employment-related aspects of the Company's equal employment opportunity policy. Accordingly, it is the Company's policy to take affirmative action to employ, advance in employment, and otherwise treat qualified minorities, women, protected veterans, and individuals with disabilities without regard to their race/ethnicity, sex/sexual orientation/gender identity or expression, veteran status, or physical or mental disability or any other legally protected characteristic. Under this policy, the Company also will provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose an undue hardship on the operation of the Company's business.

The Company's affirmative action policy also prohibits employees and applicants from being subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other Federal, state or local law requiring equal employment opportunity for disabled persons or covered veterans; (3) opposing any act or practice made unlawful by Section 503 or Section 4212 and their implementing regulations, or any other Federal, state or local law requiring equal employment opportunity for disabled persons or covered veterans; or (4) exercising any other right protected by Section 503 or Section 4212 or their implementing regulations.

The non-confidential portions of the affirmative action program for individuals with disabilities and protected veterans shall be available for inspection upon request by any employee or applicant for employment by contacting Cherise Robinson, Sr. Manager, EEO Compliance at 212-438-3840 or [cherise.robinson@spglobal.com](mailto:cherise.robinson@spglobal.com), Monday through Friday, between the hours of 8:30 am – 4:30 pm.

### **Application of Equal Employment Opportunity and Affirmative Action Policies**

These policies apply whenever and wherever a Company employee is performing a function of his or her job, including all S&P Global locations, client worksites, and Company-sponsored or client-sponsored business and social functions. The Company's equal employment opportunity and affirmative action policies require that employment decisions be based only on valid job requirements, and extend to all terms, conditions, and privileges of employment including, but not limited to, recruitment, selection, compensation, benefits, training, promotion, and disciplinary actions.

### **Workplace Harassment, Including Sexual Harassment**

A key component of the Company's commitment to equal employment opportunity is its prohibition of workplace harassment based on, or because of, an individual's race, color, religion, creed, sex, sexual orientation, gender identity or expression, national origin, age, disability, pregnancy, veteran status, citizenship status, or any other reason prohibited by law.

Such harassment, whether committed by Company personnel or by clients, customers, vendors, or other individuals doing business with S&P Global, will not be tolerated.

Prohibited harassment occurs when a supervisor, co-worker, or even a non-employee behaves or acts in such a way that creates a hostile work environment for another employee based on an individual's race, color, religion, creed, sex, sexual orientation, gender identity or expression, national origin, age, disability, pregnancy, veteran status, citizenship status, or other protected characteristic. The Company's management team is responsible for ensuring compliance with all aspects of this equal employment opportunity policy and for developing implementation strategies that promote its intent.

This policy may not be used as a basis for excluding or separating individuals of a particular gender or any other protected characteristic from participating in business or work-related social activities or discussions in order to avoid allegations of harassment. The law and Company policy prohibit disparate treatment of applicants and employees on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, pregnancy, veteran status, genetic information, citizenship status, or any other basis prohibited by law. The prohibition against harassment is intended to complement and further this policy, not to form the basis of an exception to them.

### **Obligations of Company Personnel and Reporting**

S&P Global personnel have an obligation to contribute to a harassment- and discrimination-free workplace. Any employee who suffers or observes harassment or any other violation of this policy is strongly encouraged to notify one of the individuals identified below. The Company will promptly and thoroughly investigate the alleged misconduct and, if a violation of this policy is found, will take immediate and appropriate corrective action.

### **Commitment to Non-Retaliation**

Every employee is encouraged to come forward without fear of reprisal, as the Company's equal employment opportunity and affirmative action policies prohibit any and all forms of retaliation against anyone who in good faith complains that these policies are not being followed, or who otherwise participates in a Company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been subjected to retaliation, your complaint should be directed to one of the individuals identified below.

After receiving a complaint involving a violation of the Company's equal employment opportunity or affirmative action policy, the Company will investigate and take corrective action, as appropriate. Complaints and investigations will be kept confidential to the maximum extent possible consistent with appropriate investigation and corrective action. No one, regardless of position or length of service, is exempt from these policies. Individuals violating

the Company's policy will be subject to discipline up to and including termination of employment.

### **How to Report a Violation of this Policy**

If you believe that you have been subjected to unlawful discrimination, workplace harassment, or retaliation, you can utilize the following resources to address and resolve your concerns:

- **Open Door Policy:** Our longstanding Open Door Policy encourages employees to discuss any work-related complaint or problem with the management team in your organization.
- **Human Resources:** Many of your concerns can be addressed by contacting your Human Resources Business Partner or Employee Relations.
- **EthicsPoint:** Provides employees with a means to confidentially report their concerns. Available to employees worldwide through the [EthicsPoint](#) reporting system.
- **Legal Department:** Your legal concerns can be brought to the attention of the Legal Department.

Matters will be appropriately and promptly investigated and kept confidential to the maximum extent possible, with disclosure only to those who have a need to know. Any employee found to be engaging in any form of harassment, unlawful discrimination, or retaliation against a person bringing a claim or against a person assisting or participating in an investigation; will be subject to disciplinary action up to and including termination.

### **Responsibility for Implementation**

As President & CEO, I fully support our affirmative action program and am committed to the implementation of the Company's equal employment opportunity and affirmative action policies. I have delegated overall responsibility for these policies to Cherise Robinson, Sr. Manager, EEO Compliance.



Douglas L. Peterson  
President & Chief Executive Officer