

An aerial photograph of a lush green forest with a winding river. The river flows through the center of the forest, creating a network of channels and islands. The trees are dense and vibrant green, and the water is a clear, light blue. The overall scene is peaceful and natural.

FACTSET

Code of Business Conduct & Ethics

Updated December 6, 2023

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A great place to work.

Our commitment to our clients, our culture, and our values is what sets us apart. Even as we adopt cutting-edge technologies and find new ways to create, innovate, and grow our business sustainably, this commitment remains the key to our success. We are poised for the future and excited for the opportunity to build it together.



“The Code serves as a resource to help us navigate the complex business environments in which we operate.”



I'm optimistic about the opportunity in front of us at FactSet. We've collectively remained focused on executing our strategy, growing with new and existing clients, and helping the investment community do its best work. We've been recognized as a market leader in many ways, and we are making great progress putting out new product, scaling our data assets, giving back to our communities, and much more. We've done all of this while guided by our values and the principles outlined in this Code of Business Conduct and Ethics.

The Code helps us ensure that as we realize our vision for the future, we keep integrity at the forefront of all our business interactions, and we remain steadfast in our longstanding values, which we recently refreshed to reflect the “FACTS” about FactSet: we are future-focused, always inclusive, client-centric, tenacious, and solution-driven. The Code outlines the policies and practices that govern our daily activities and serves as a resource to help us navigate the complex business environments in which we operate.

As I said, we have an opportunity to help our clients achieve more, and it's going to take all of us to execute our plans and win in the year ahead. Thank you for your continued commitment to FactSet, to living our values, and to upholding the Code of Business Conduct and Ethics.

A handwritten signature in black ink that reads "Phil S".

Phil Snow
CEO

Our Company

WHO WE ARE

For decades, the world's financial professionals have relied on FactSet, across teams, asset classes, and at every stage of the investment process. We create flexible, open data and software solutions providing instant anytime, anywhere access to financial data and analytics that investors use to make crucial decisions.

OUR PURPOSE

With open, flexible technology, smart, connected content, and a team that works harder for our clients every day, we're committed to helping investment professionals see more, think bigger, and do their best work.

Our Values: We Believe In Facts



F FUTURE FOCUSED

We lead with curiosity, ask thoughtful questions and make smart decisions to stay ahead.



A ALWAYS INCLUSIVE

We foster a diverse and inclusive community by listening to each other because we know the best ideas can come from anyone, anywhere, at any time.



C CLIENT-CENTRIC

We serve as an extension of our clients' teams and go above and beyond to help reach their goals.



T TENACIOUS

We strive to learn and do better every day, helping our clients, our communities, and each other grow.



S SOLUTION-DRIVEN

We have a bias for action and measure our success based on the impact that we make.

 [Learn More](#)

Visit our [Purpose and Values page](#) on the intranet to learn more.

Diversity, Equity, and Inclusion

We value diversity, recognizing that our best ideas can come from anyone, anywhere, at any time. We foster a globally inclusive culture, empowering our people to be themselves at work and to solve our clients' greatest challenges by leveraging diversity for collaboration, innovation, and shared success. We remain committed to investing in and expanding our DE&I journey, ensuring an inclusive and equitable workplace and ecosystem for our stakeholders, and positively impacting the communities in which we operate.

 [Learn More](#)

Visit our [Diversity, Equity & Inclusion page](#) on the intranet to learn more.

IMPACT AREAS AND LEVERS

01

Workforce

1. Leadership Commitment
2. Transparency & Accountability
3. People Processes
4. Retention & Advancement
5. Recruitment
6. Education
7. Engage



Inclusion,
Equity &
Belonging

02

Marketplace

8. Supplier Diversity
9. Collaboration with Clients



Economic
Opportunity

03

Society

10. Investments
11. Contributions
12. Corporate Voice



Justice

Corporate Responsibility

Just as we help our clients solve their greatest challenges through collaboration, we believe that giving back to our communities is part of our culture. We invest in the communities where we work through employee volunteerism

and charitable giving. We focus our efforts on four key areas, partnering with best-in-class nonprofit organizations that provide meaningful volunteer opportunities for our employees.

 [Learn More](#)

Visit our [Corporate Social Responsibility](#) page on the intranet to learn more.



EDUCATE TO ELEVATE

Preparing young people for future success with the skills, competencies, and connections to transition into quality work, education, and training.



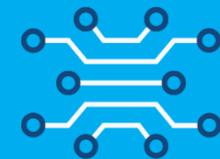
PROTECT OUR ENVIRONMENT

Preserving community green spaces in the places where we work and supporting research that empowers environmental conservation.



ALLEVIATE FOOD INSECURITY

Ensuring young people have access to safe, nutritious food to boost educational attainment and encourage long-term achievement.



INSPIRE TOMORROW'S ENGINEERS

Developing future technology leaders by helping young people grow their engineering skills and find pathways into the tech industry.

Our Commitment

We are committed to sustainable growth and doing business the right way—ethically, honestly, and with integrity.

Our Commitment

The Code of Business Conduct and Ethics applies to all FactSet directors, officers, and employees, as well as all contractors and temporary workers while on assignment at FactSet. We hold ourselves to the highest standards, demonstrating, both through our words and our actions, the importance of acting in accordance with the law, this Code, and FactSet's policies.



EMPLOYEE RESPONSIBILITIES

Each of us is responsible for:

- Reading and understanding the Code and FactSet's policies and seeking guidance when needed
- Acting in compliance with the Code and applicable laws, rules, and regulations everywhere we do business
- Treating our clients, co-workers, and business partners with kindness, compassion, and respect
- Promptly raising any and all policy violations and supporting others who raise compliance concerns
- Cooperating fully in any and all compliance investigations

LEADER RESPONSIBILITIES

FactSet leaders are responsible not only for achieving business results, but also for driving a culture of ethics and integrity throughout their organizations. Leaders are accountable for any compliance lapses that result from their failure to instill this culture within their teams. In addition, leaders are responsible for:

- Leading by example, upholding the Code and our values, and acting as an advocate for sustainability, diversity and inclusion, good governance, and ethical business practices
- Making themselves available to employees who have questions or concerns or who wish to report potential violations of the law, the Code, or FactSet's policies
- Escalating all Code violations through appropriate channels, including FactSet's Chief Legal Officer, Chief Compliance Officer, or a member of the Human Resources Department.



Personal Commitment

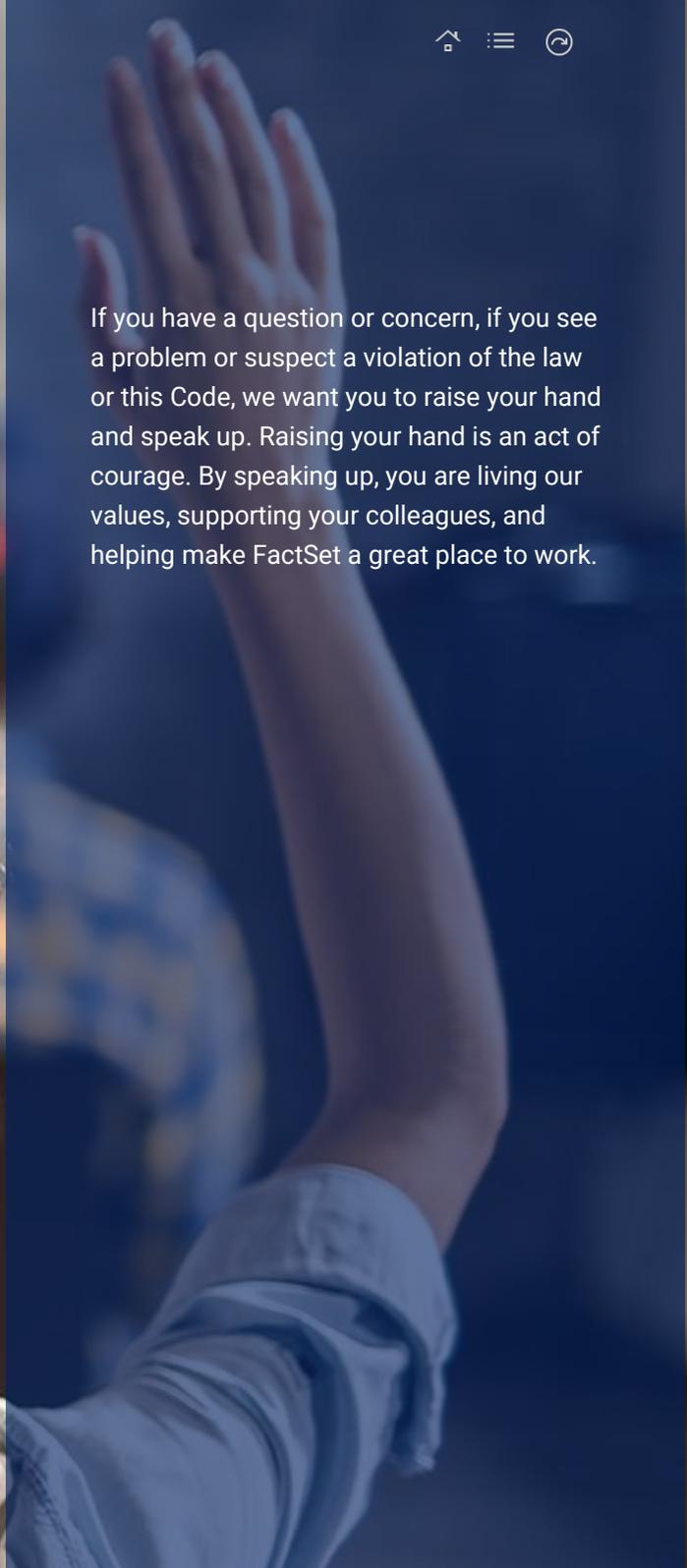
Integrity is the cornerstone of our business success. Each of us must make a personal commitment to act lawfully and ethically on behalf of our clients and in all our business interactions. To that end, all employees, directors, and officers will be asked annually to sign a Personal Commitment Statement, acknowledging their commitment to comply with the Code and report potential violations.

Notice: FactSet respects employees' right to choose to be represented by a labor organization. To the extent any provisions of this Code are inconsistent with an applicable collective bargaining agreement, the collective bargaining agreement will control. Employees who are represented by a labor organization are encouraged to carefully review the Legal Notices section at the conclusion of this document, which outlines certain employee representation rights and may modify how certain provisions of this Code apply to employees represented by a labor organization. Employees are encouraged to contact their labor organization concerning any such issues or concerns. Nothing in this Code or any other policies is intended to or shall be construed to prohibit employees (whether or not represented by a labor organization) from engaging in any conduct or activities protected by applicable law, including but not limited to protected activities under the National Labor Relations Act.

Speaking Up

We strive to create a workplace where every employee is respected and every voice is heard.

Speaking Up



If you have a question or concern, if you see a problem or suspect a violation of the law or this Code, we want you to raise your hand and speak up. Raising your hand is an act of courage. By speaking up, you are living our values, supporting your colleagues, and helping make FactSet a great place to work.

Please Speak Up If:

- You think you or someone else may have violated the law, the Code, or any FactSet policy
- You think someone is about to do something that violates the law, the Code, or any FactSet policy
- You are unsure about how to handle a situation and need some advice



HOW TO RAISE A CONCERN

Several resources are available to you when you have a policy question or compliance concern. You can use this Code and the intranet to find more information about our policies and how to comply with them. If you still have questions or would like to report a concern, you can contact:

- Your supervisor or manager
- Your HR Business Partner or any other member of the Human Resources Department
- FactSet's Chief Legal Officer
- FactSet's Chief Compliance Officer Lisa Stewart Hughes at lisa.hughes@factset.com or +1-347-491-8160
- Any attorney in FactSet's Legal Department or member of the Compliance team
- An appropriate regional grievance committee or similar resource (e.g., the Anti-Harassment Committee in India, local whistleblowing officer in Bulgaria)

- FactSet's Ethics Action Line is available 24 hours a day, seven days a week, in multiple languages, and with the option to report anonymously (where permissible under local laws) at www.FactSetEthicsActionLine.com or by calling +1-800-461-9330 or by texting +1-959-207-3774 (text available in North America only)

Apart from our global reporting channels, certain locations have additional options for raising reports. Visit the [Ethics and Compliance Sharepoint](#) to learn more.

We know that speaking up is not always easy, so please choose the reporting channel that is most comfortable for you.

If you are unprepared to raise a concern through these official channels, ask a colleague or anyone else you trust in FactSet for support. You'll find that FactSetters will be more than willing to help you report your concern.

WHAT HAPPENS WHEN CONCERNS ARE RAISED

- All concerns raised in good faith will be carefully reviewed and addressed, regardless of the reporting channel used.
- Confidentiality, while not guaranteed, will be protected. We will take all possible steps to protect the privacy of the individuals involved and ensure any information provided is shared only on a need-to-know basis or as required under applicable laws. Concerns raised anonymously will be kept anonymous.
- Immediate, interim protections will be put in place where appropriate to guard against any continued wrongdoing or harm to individuals.
- A neutral investigator with the necessary experience will be assigned to review the matter and, if appropriate, to initiate an investigation.
- The investigator will determine the facts by reviewing documents (both hardcopy and electronic), conducting interviews, and completing other methods of investigation.
- If wrongdoing is confirmed, appropriate disciplinary and/or corrective action will be taken regardless of the position or seniority of the individuals involved.

- The person who reported the concern will be advised of the outcome of the investigation, where appropriate and permissible under applicable laws. Consideration will be given to the importance of confidentiality and the need to respect the privacy rights of everyone involved.



ANONYMOUS REPORTING AND CONFIDENTIALITY

Concerns can be raised anonymously via the Ethics Action Line (although a few jurisdictions may impose certain limitations on anonymous reporting). If you want to raise a concern anonymously, you can do so without providing your name or other identifying information. However, it is essential to be sufficiently detailed in your report so that we can follow up appropriately and investigate the concern. We respect anonymity and use the Ethics Action Line to communicate with anonymous reporters as needed.

If you choose to raise a concern and provide your name, you can rest assured that the information provided will be kept confidential to the extent possible. The identity of the person reporting the issue and the information provided will be shared on a “need-to-know” basis only with those responsible for investigating, addressing, and resolving the concern or as required by law.

NO RETALIATION

We want our employees to feel comfortable raising concerns without fear of retaliation or reprisals. FactSet strictly prohibits retaliation against any individual for asking a question or reporting a possible violation of the law, this Code, or any FactSet policy. An employee may not be discharged, demoted, suspended, threatened, harassed, intimidated, coerced, or retaliated against in any other manner because they asked a question or raised a concern in good faith or assisted in the handling or investigation of a concern raised by someone else. Any employee who retaliates or participates in retaliating against a co-worker for raising a compliance concern will be subject to disciplinary action, up to and including termination of their employment.

If you believe that you have been retaliated against, please let us know immediately so that appropriate action can be taken.



Learn More

You can refer to [FactSet's Whistleblower and Anti-Retaliation Policy](#) to learn more.

Ways to Speak Up



Online

<https://FactSetEthicsActionLine.com>

You can access FactSet's Ethics Action Line 24 hours a day, seven days a week, and in multiple languages, by clicking on the link above. FactSet employees can also access the Ethics Action Line from the intranet.



People you can talk to

Managers

Feel free to speak with your manager or supervisor regarding your concern. You can also contact your department leader.



Phone

<https://FactSetEthicsActionLine.com>

Visit the FactSet Ethics Action Line to access local calling numbers. You can raise a concern by phone in multiple languages.



Email

Compliance@FactSet.com

You can send an email to Compliance@FactSet.com.

AuditCommittee@FactSet.com

For concerns regarding accounting, internal accounting controls, or auditing matters, you can send an email to AuditCommittee@FactSet.com.

Human Resources

Your HR Business Partner is another resource, or you can speak with anyone in the HR Department.

Respecting Our People and Our Communities



Fair Employment Practices and Maintaining a Respectful Workplace

Our people are our greatest asset, so ensuring that our workplace is respectful, collaborative, and inclusive is our top priority. We believe that creativity and innovation are driven by our ability to attract, retain, and engage employees from diverse communities with unique backgrounds, abilities, and life experiences.

FactSet requires all employees, clients, and business partners to act respectfully and professionally when interacting. Discriminatory behavior, harassment, bullying, and abusive conduct are prohibited, whether occurring at a FactSet facility, a client's office, an off-site business entertainment venue, a team-building or social event, or any other work location. To maintain a respectful and professional work environment, we must treat our colleagues, clients, and business partners with kindness, dignity, and respect.

WHAT YOU NEED TO KNOW

- FactSet prohibits discrimination and promotes fairness in all aspects of employment, including recruitment, hiring, compensation, assignments, promotions, and termination, so that all employees have an equal opportunity and incentive to reach their highest potential.
- Employment decisions are based solely on job-related criteria and made without regard to race, sex, gender, religion, nationality, ethnic origin, citizenship, age, disability, sexual orientation, gender identity, characteristics or expression, pregnancy, family status, or any other protected class status.
- Reasonable accommodations are provided in compliance with applicable laws and where necessary to promote fairness and non-discrimination.
- FactSet prohibits discriminatory, harassing, bullying, or abusive conduct, as such behavior violates our Code, damages working relationships, and may also be illegal.
- All reports or concerns regarding possible discrimination or harassment should be brought to the attention of Human Resources, Legal, or Compliance.

WHAT TO WATCH OUT FOR

- Any unequal or unfair treatment of an individual or group that violates FactSet's values, this Code, or the right to equal opportunity.
- Conditions that promote bullying or abusive behavior or might create a hostile work environment such as displaying offensive images or materials, derogatory comments, or humiliating co-workers.
- Unwanted sexual advances or inappropriate comments from a manager, co-worker, client, supplier, or other business partner.
- Offensive comments or jokes about a person's age, race, religion, gender, gender identity or expression, sexual orientation, or another protected category or characteristic.
- Adverse treatment or actions taken against any individual because they raised a concern about discrimination, harassment, bullying, or abusive conduct in the workplace.



What Do You Think?

You accept a client's invitation to coffee but find that the conversation is not about work. The client asks you questions about your personal life that make you uncomfortable and later texts you to ask if you'll join them for a drink after work. You mention these interactions to your manager who dismisses them as harmless. What should you do?



Your manager should have taken your concerns seriously, addressed them directly with the client, or escalated the issue to HR, Legal, or Compliance. If you raise a concern and it is not taken seriously, you should speak with the department leader above your manager, HR Business Partner, or a member of the FactSet Legal or Compliance teams to register your concern.

Learn More

You can refer to FactSet's [Equal Employment Opportunity Policy](#) and [Anti-Discrimination and Harassment Prevention Policy](#) to learn more. Additional resources for harassment prevention and support are available in our [Stand Together: Anti-Discrimination and Harassment Prevention Hub](#).

Environment, Health, and Safety



We comply with all environmental laws, rules, and regulations applicable to our business. Beyond compliance, FactSet is committed to being a responsible steward of the environment and we seek to minimize the environmental impact of our operations.

We strive to maintain a safe and healthy workplace with adequate safeguards and protections against occupational injuries, ill health, and workplace violence for employees, business partners, visitors, and subcontractors.

WHAT YOU NEED TO KNOW

- We hold ourselves accountable for our environmental impact by monitoring, measuring and reporting on our environmental performance. We work with our employees and other stakeholders to achieve our environmental and sustainability goals.
- FactSet has programs in place to reduce energy consumption and waste generation across our offices.
- FactSet periodically assigns employees health, safety, and physical security training. Employees are required to complete these training courses and to abide by the written guidelines on employee health and safety available on the intranet.
- FactSet considers the environmental and sustainability impacts of its supply chain. We work with our third-party vendors and other business partners to promote sustainable business practices.

WHAT TO WATCH OUT FOR

- Suppliers or contractors who are unable or unwilling to commit to sustainable business practices or fail to provide a safe and healthy workplace for their workers.
- Blocked exits, tripping hazards, or other health and safety violations in our facilities or office spaces.
- Employees sharing their access cards or allowing unauthorized persons to enter FactSet offices and secure facilities.
- Possession of any weapons in the workplace, at FactSet-sponsored events, or while engaged in activities for or on behalf of FactSet. Weapons include guns, knives, pepper spray, explosives, and any other instruments designed to inflict physical injury or bodily harm.



Did You Know?

FactSet has committed to setting a near-term, company-wide emission reduction target in line with the [Science Based Targets Initiative \(SBTi\)](#), and has announced a future goal of achieving net zero emissions by 2040. You can learn more about FactSet's sustainability program [here](#).



Learn more

You can refer to FactSet's [Environmental Policy](#) and [Occupational Health and Safety Policy](#) to learn more.

Human Rights

We are committed to protecting human rights and the principles expressed in the UN International Bill of Human Rights, the UN Global Compact, and the International Labor Organization's Declaration on Fundamental Principles and Rights of Work. We take pride in the role our products and services play in helping organizations commit to responsible investing. Using FactSet's products, investors are armed with the data they need to make informed decisions and support businesses that respect civil liberties and human rights, establish ethical and sustainable business practices, and strive to positively impact the communities they serve.



WHAT YOU NEED TO KNOW

- In recognition of the inherent dignity of all persons, FactSet abides by the principle of non-discrimination in all aspects of employment, which includes recruitment, training, promotion, compensation and termination. We foster an inclusive culture that respects and appreciates our employees' differing beliefs, religions, ethnicities, sexual orientation, life experiences, and cultural backgrounds.
- Employees are free to form groups to promote and defend their occupational interests. Participating in such groups and associations will not result in adverse treatment or retaliation.
- We support freedom of speech. We welcome the reasonable expression of diverse points of view and encourage listening with empathy and compassion.
- We prohibit all forms of forced or child labor in our organization and our global supply chain.

- We comply with local and international labor laws worldwide and work only with third parties who promote safe and healthy working conditions for their employees. If you observe any indications of labor law violations at FactSet or in our supply chain, please report your concerns immediately.
- We strive to work only with business partners who demonstrate a commitment to anti-discrimination, fair labor practices, freedom of speech and freedom of association, the eradication of human trafficking, and prevention of all other human rights abuses.

WHAT TO WATCH OUT FOR

- Suppliers or contractors who are unwilling or unable to comply with FactSet's Supplier Code of Conduct, who fail to provide a safe and healthy workplace for their workers or refuse to submit to supplier audits or provide adequate employment documentation upon request.



Did You Know?

We recognize that FactSet must act responsibly and thus are committed to improving our practices to combat slavery and human trafficking. To access FactSet's UK Modern Slavery Act Statement, visit the Investor Relations page on our public website at www.FactSet.com.



Learn more

You can refer to FactSet's [Human Rights Policy](#) and [Supply Chain Code of Conduct](#) to learn more.

Protecting Our Clients and Assets

Accurate Record-Keeping and Financial Reporting

We are committed to accuracy in our financial accounting and to fair, accurate, timely, and understandable disclosures in our reporting to government agencies, investors, and the public. All financial statements, books and records, contracts, and accounts must accurately reflect the underlying transactions and conform to legal requirements, generally accepted accounting principles, and FactSet's internal accounting standards.



WHAT YOU NEED TO KNOW

- Maintain complete and accurate records of FactSet's financial transactions and retain them in accordance with law and FactSet's [Document Retention Policy](#).
- Before signing a document or approving a transaction, be sure you have appropriate authorization to sign, verify the underlying facts and completeness of the information in the document and ensure there is an appropriate business rationale for the approval.
- Do not create false or fraudulent records, falsify documents, or otherwise misrepresent facts, transactions, or financial data.
- Make sure all agreements with our customers or suppliers correctly reflect the services to be provided, the amounts to be paid in consideration, and all other contractual and legal obligations.
- Ensure that FactSet's accounting and retention procedures and other applicable accounting principles and regulations are consistently followed. When in doubt, seek guidance from the Finance or Legal Departments.

WHAT TO WATCH OUT FOR

- Records of financial transactions or other reports that contain errors or misleading descriptions, including false expenses or inaccurate time sheets.
- Transactions or decisions that do not make business sense or financial results that do not appear consistent with actual business performance.
- Lack of established controls or safeguards on transactions, actions that exceed an employee's authority level, or attempts to avoid required signatures or approvals on expenses.
- Destruction, alteration, or removal of records, whether digital or physical, from FactSet's files other than in accordance with FactSet's document retention and disposal procedures.



Here's a Tip

Raise a concern if you become aware of actions, transactions, accounting, or reporting that include false or misleading information or are otherwise inconsistent with FactSet's values and this Code.

Red flags include:

- Financial results that seem inconsistent with actual performance
- Circumventing review and approval procedures
- Incomplete or misleading information about the substance or reporting of a transaction

Report accounting, internal controls, and auditing concerns directly to the Audit Committee by sending an email to AuditCommittee@Factset.com.



Learn more

You can refer to FactSet's [Anti-Bribery and Corruption Policy](#) and to the [Document Retention Policy](#) to learn more.



Intellectual Property and Confidential Information

Intellectual property is the lifeblood of our business. It includes FactSet's self-developed software and FactSet-owned data, know-how and trade secrets; our trademarks and brands; and any software, data, and other copyrighted materials licensed by FactSet from third parties. We actively protect our intellectual property rights, and we respect the valid intellectual property rights of others. We safeguard FactSet's proprietary and confidential business information and protect it from unauthorized usage or disclosures.

WHAT YOU NEED TO KNOW

- Do not share FactSet’s confidential or proprietary information with third parties except under an approved non-disclosure agreement or other contractual terms that appropriately restrict its disclosure and use.
- Respect the intellectual property rights of FactSet’s clients, suppliers, and other business partners and treat such data with the same degree of care we afford our own proprietary data.
- Ensure our third-party data or software usage is consistent with license restrictions.
- Disclose confidential information within FactSet only on a need-to-know basis.
- Be mindful of email or phone scams (also known as phishing) that may ask you to reveal confidential information.
- Securely destroy personal and confidential data when it is no longer needed or as required by FactSet’s Document Retention Policy.
- Subject to applicable laws, FactSet owns all software, code or applications, inventions, and creations generated by FactSetters in the course of their employment.

WHAT TO WATCH OUT FOR

- Obtaining or using data, images, copyrighted material, or other information belonging to a third party without proper authorization, which could include copying or using images, open-source software, financial data, or written material obtained from online sources or third parties.
- Sending sensitive information via unencrypted email, discussing confidential information in a public space or other location where others might overhear, or creating written material without labeling it according to FactSet’s information classification and handling instructions.
- Sending FactSet’s proprietary or confidential information to unauthorized third parties or using it for personal gain or benefit.
- Using confidential or proprietary data or as a prompt in a large language model or to train an AI program without proper authorization.



Did You Know?

Content, images, or other files may be easy to download from the Internet and may be free, but beware – they are likely still subject to license restrictions. Make sure you fully understand and follow the terms and conditions associated with any downloaded content. If you are unsure, contact the Legal Department for support.

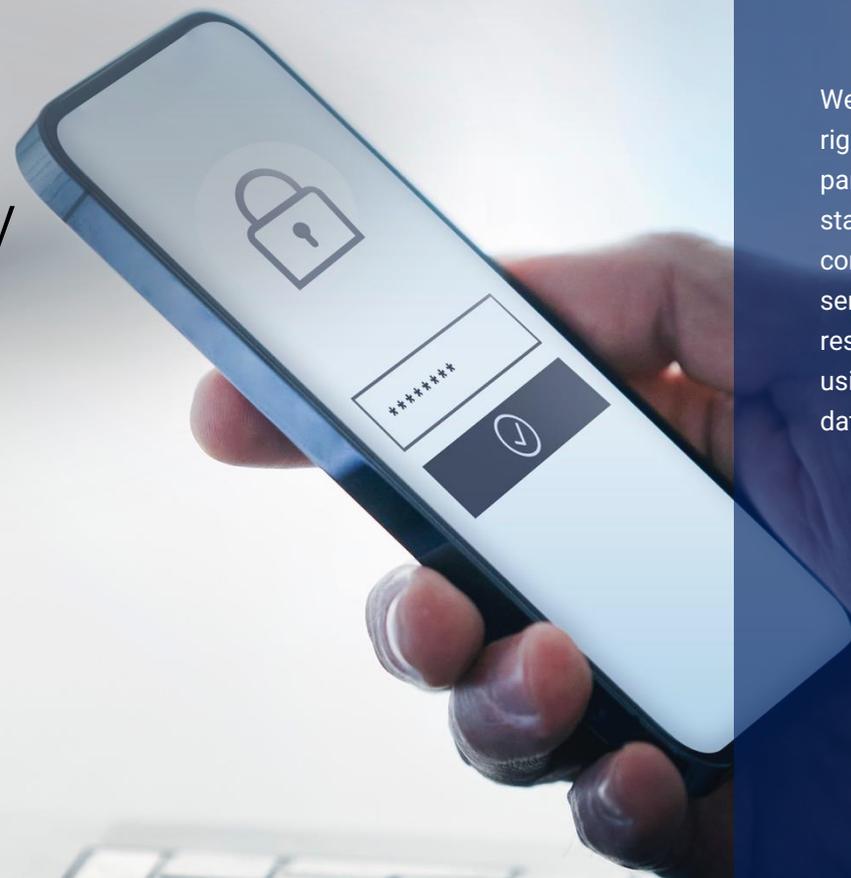
The default settings on some open-source software are set at “public,” which means that anything you do or post can be visible to others on the Internet. This could result in the loss of proprietary or confidential information belonging to FactSet. You can learn more about the usage of open-source software by reading FactSet’s [Open Source Code Use Policy](#).



Learn more

You can refer to FactSet’s [Recording Meetings Policy](#) and [Media and Communications Policy](#) to learn more.

Data Privacy and Information Security



We respect the privacy and data protection rights of our employees and business partners and hold ourselves to the highest standards when protecting personal, confidential, and proprietary data and other sensitive information. Employees should act responsibly and carefully when collecting, using, storing, or otherwise processing the data entrusted to us.

WHAT YOU NEED TO KNOW

- Personal information refers to any data that can be used to identify an individual, including names, contact information, personal profiles, or the voice, image, or location of an individual. It also extends to indirect information such as device or application identifiers like IP addresses.
- To protect personal information or other sensitive data, you should:
 - Label it properly
 - Use it only for the agreed business purpose
 - Share it only with those authorized individuals who have a legitimate business need and/or have a signed non-disclosure agreement or similar contract
 - Properly store and dispose of it when no longer needed
 - Encrypt sensitive information and protect it with role-based access controls
- If you suspect a cybersecurity incident, a breach of FactSet's information system, or unauthorized exposure of personal information, report it immediately by filing an RPD or contacting your direct manager or a member of the Information Security team.

- Follow all terms outlined in our client contracts, including those that define how we access, collect, and handle personal data. Do not process or store personal data in a way that is inconsistent with our customer commitments or our internal privacy policies.

WHAT TO WATCH OUT FOR

- Confidential or personal data left in a meeting room, on a printer, shared server, or publicly accessible computer or website.
- Maintaining personal and confidential data when it is no longer needed or after it should be destroyed in accordance with FactSet's document retention policies.
- Storing personal data on a hard drive or other environments not authorized by FactSet.
- Disclosing personal information to a third party who has not signed an appropriate non-disclosure agreement or is otherwise obligated to protect it.
- Failure to protect against viruses, malware, phishing or social engineering, and other security risks by installing unapproved software or applications; using unauthorized devices to access our network; sharing passwords or access codes; or opening suspicious or unsolicited email.



What Do You Think?

Someone accidentally emailed me a report that includes employee names, government IDs, and payroll information. What should I do?



You should let the sender know of the mistake so that they can take steps to avoid any further inappropriate disclosures. Then, contact your manager or Legal or Compliance immediately and let them know about the document you received. Disclosure of this information to you, even if inadvertent, may require remedial action, so it's best to get Legal or Compliance involved.



[Learn more](#)

You can refer to FactSet's [Data Protection Policy](#) to learn more.

Doing Business the Right Way

Fair Competition

FactSet wins and maintains client relationships based on the value of our products and our commitment to client service. We compete vigorously and aggressively but always comply with applicable competition and antitrust laws worldwide. These laws promote fair competition by prohibiting anti-competitive agreements, restricting abusive behavior by dominant companies, and requiring advance review and approval of commercial arrangements that might stifle competition. All FactSet employees and contractors are expected to comply with these laws and to deal fairly with our customers, suppliers, and other business partners.

WHAT YOU NEED TO KNOW

- Avoid sharing competitively sensitive information with competitors such as:
 - Prices of our products and services
 - Production costs
 - Engineering and product development strategies
 - Distribution and licensing channels
 - Proposals or bids for business
 - FactSet's financial position
 - Sales territories and responsibilities
- You are free to gather competitive intelligence from public sources such as websites, published articles, advertisements, public presentations, and customer conversations. Do not accept competitive intelligence that would violate confidentiality obligations.
- Never agree with our competitors to set prices or contract terms or to divide or allocate markets, geographic territories, customers, or suppliers.
- Always use the current and approved version of the applicable client-facing legal agreement when selling FactSet products and services and abide by the pricing guidelines established by your sales team.
- Avoid illegal or unauthorized bundling of our products and services.

- Be accurate and transparent when advertising FactSet's products and services. Avoid any attempt to mislead or conceal facts from our clients or prospects.

WHAT TO WATCH OUT FOR

- Meetings or conversations with competitors that could disclose competitively sensitive information. Be careful when interacting with competitors and consult Legal if you have any questions.
- Aggressive or hyperbolic language in any FactSet documentation or communications, including emails and instant messages that could be misinterpreted. Avoid expressions about "crushing" the competition or "dominating" the market, and do not speculate about whether an activity is legal or illegal.
- False, misleading, or inaccurate statements about FactSet products or services or those of our competitors. In our business dealings with clients and potential clients, focus on the strengths of FactSet's offerings rather than criticizing others.



What Do You Think?

You are attending a conference and run into a former colleague who has since started working for a competitor of FactSet. As the two of you catch up over coffee, she begins asking some probing questions about FactSet's pricing strategy. You try to steer the conversation to other topics, but she is persistent and offers to give you details about her new employer's pricing in exchange, promising to keep it "just between us." What should you do?



Politely decline her offer and then contact the Legal department. Sharing competitive information like pricing can violate competition laws, so you should not divulge this information to a friend or anyone else who works for a competitor. You should also contact Legal about the conversation – a FactSet attorney will be able to document what happened and advise what more, if anything, should be done to protect you and FactSet.

Anti-Corruption

A photograph showing a person in a grey striped shirt holding a stack of US dollar bills. Another person in a dark suit has their hands raised in a gesture of refusal or protest. The background is a blurred office setting with windows and computer monitors.

FactSet prohibits bribery and corruption of any kind. Bribery can come in the form of improper cash payments, kickbacks, or gifts directly or indirectly offered to or received from a private client, government official, supplier, or another third party. Facilitation payments to expedite routine administration actions is also prohibited. We maintain accurate books, records, and accounts that correctly reflect the true nature of all transactions and engage only reputable third parties who share our commitment to accuracy, transparency, and ethical business practices.

WHAT YOU NEED TO KNOW

- Do not offer or accept gifts, whether cash or in-kind, or anything else of value (e.g., a favor, letter of recommendation, promise of future business) if it is intended to influence a business decision improperly.
- Follow FactSet's Gifts & Business Entertainment Policy, which requires approval before giving or accepting gifts valued over \$100 USD.
- Be especially careful when working with government officials, including employees of a state-owned or controlled bank, sovereign wealth fund, or other enterprise.
- Never make – or authorize a third party to make – a facilitation payment to a government official to expedite a routine administrative service, such as customs clearance, visa application, or the issuance of a license, permit, or other government approval.
- FactSet may be held responsible for illegal acts committed by its representatives, so follow FactSet's due diligence procedures when hiring consultants, contractors, and other third-party agents to represent FactSet. Ensure these third parties are carefully screened and selected and that they comply with the law, the Code, and all Fact Set policies.

- Maintain accurate, detailed books and records of all financial transactions.

WHAT TO WATCH OUT FOR

- Unusually lavish or expensive gifts, travel, lodging, hospitality, or other benefit offered to a government official or private client, or their family members or friends.
- Offers or requests for donations to charities or organizations that may be affiliated with a government official or a private client.
- Brokers, agents, or facilitators who claim to “have connections” that allow them to circumvent regular bureaucratic processes or obtain unusually fast clearances or other approvals.
- Attempts to record a transaction inaccurately or incompletely or to expedite approval or payment in a way that might compromise financial controls.
- Invoices that lack sufficient detail, accompanying receipts, or backup documentation.
- Suggestions to direct FactSet business through a specific representative or partner due to a “special relationship”.



What Do You Think?

I would like to offer my client front row tickets to a sporting event but am unable to attend the event myself. The tickets cost \$150 each. Can I give the clients two tickets so that they can enjoy the event with a personal guest?



No. FactSet's Gifts & Entertainment Policy prohibits giving gifts valued above \$100 USD. Reasonable entertainment of a client at a sporting event is generally permissible. However, you are prohibited from giving a client tickets to an event where you will not be present to discuss business, build goodwill, or develop the business relationship.



Learn more

You can refer to FactSet's [Anti-Bribery and Corruption Policy](#), [Gifts & Business Entertainment Policy](#), and [Supply Chain Code of Conduct](#) to learn more.

Money Laundering, Terrorist Financing, and Trade Controls

FactSet does not support, facilitate, or condone money laundering, tax evasion, or doing business with individuals, governments, or entities involved in illegal trade or subject to applicable sanctions.

We comply with FactSet policies and procedures designed to prevent FactSet from: (1) receiving the proceeds of crime; (2) aiding or abetting third party attempts to evade taxes, currency controls, or other regulations; and (3) violating trade sanctions or international embargoes.



WHAT YOU NEED TO KNOW

- Money laundering is the process by which individuals or entities try to conceal the proceeds of crime or make the source of illicit funds look legitimate.
- Terrorist financing is the solicitation, collection, or provision of funds from both legal and illicit sources to support terrorist acts or organizations.
- Sanctions restrict FactSet's business dealings with specific governments and jurisdictions, as well as individuals and entities designated under programs related to terrorists and international criminal organizations, weapons of mass destruction, narcotics trafficking, and more.
- Employees, particularly those with client contact, are required to follow our [Know Your Client Policy](#) ("KYC"), which involves:
 - Assessing potential clients to confirm that we are doing business with a valid, duly organized and financially-sound legal entity with a history of ethical business practices
 - Communicating with clients about our compliance expectations
 - Continuously monitoring clients' business practices

- Refusing to do business with or aid clients or suppliers suspected of wrongdoing related to our products and services
- Reporting any suspicious transactions or activities by a client or supplier to your manager and the Legal Department

WHAT TO WATCH OUT FOR

- Prospective clients or business partners who refuse to comply with FactSet's reasonable due diligence requests, who provide documents that cannot be verified, who are reluctant to provide detailed information about their business, or who shield the identity of beneficial owners or partners.
- Clients or business partners located in countries subject to applicable sanctions, such as Syria, Cuba, North Korea, Iran, and the Crimea region of Ukraine.
- Business partners owned or associated with individuals who appear on lists of Specially Designated Nationals (SDNs), Designated Persons, Politically Exposed Persons, or other government watchlists.



What Do You Think?

A prospective client requests that their contract be made in the name of a subsidiary in a different country. Is that OK?



As a general rule, we should only enter into agreements with the entity that would actually use our products. A request to contract with a different entity may indicate an attempt to evade taxes, currency controls, or other laws or regulations. You should discuss with Legal if you encounter this situation.



Learn more

You can refer to FactSet's [Know Your Client Policy](#) to learn more.

Conflicts of Interest



We act in the best interests of FactSet and avoid influences, interests, associations, or activities that might interfere with our work or objective decision-making. We use FactSet assets and resources for the benefit of the Company and to support FactSet's business needs.

FactSet employees should disclose any actual or potential conflicts of interest and avoid activities, both inside and outside of work, that might interfere with their obligations to FactSet or negatively affect FactSet's reputation. Seek advice from Compliance or discuss your concerns with your manager if you have or think you may have a conflict of interest. Many conflicts can be avoided or addressed if they are promptly disclosed and properly managed.

WHAT YOU NEED TO KNOW

- A conflict of interest exists when an employee's private interest (whether personal, social, financial, political, or otherwise) interferes with FactSet's interests or when an employee takes action or has interests that make it difficult to perform their work at FactSet objectively and effectively.
- Conflicts of interest also arise when an employee or employee's family member or personal contact receives improper personal benefits or enrichment as a result of their position or through access to confidential information.
- Employees are prohibited from competing with FactSet or taking personal advantage of opportunities presented to them or discovered by them as a result of their positions with FactSet.
- Even the appearance of a conflict of interest can be damaging and should be avoided.

WHAT TO WATCH OUT FOR

- Employment, board service, ownership or significant financial interest in a competitor, client, vendor, or service provider or entity that does business, seeks to do business, or competes with FactSet.
- Gifts, favors, loans, or preferential treatment from any person or entity that does business with or seeks to do business with FactSet.
- Charitable contributions or political donations from any person or entity that does business with or seeks to do business with FactSet.
- Conducting business transactions with a family member or a person who shares your household or involving a business in which you have a significant financial interest.
- Taking personal advantage of corporate opportunities.
- Using corporate resources or assets for personal gain or non-business purposes.
- Outside employment or other activities that interfere with or adversely affect your work for FactSet.



Here's a Tip

When considering whether a conflict of interest exists, ask yourself these questions: Do I have a significant financial interest in a company that does business or competes with FactSet?

- Do I spend time on external work during my FactSet working hours?
- Am I using any FactSet assets or resources for purposes other than my work in FactSet?
- Do I accept valuable or frequent gifts from suppliers, clients, or competitors?
- Am I in a position to hire or supervise a family member or close friend?

Consult Compliance if you are unsure if a situation presents a conflict of interest.



Learn more

You can refer to FactSet's [Conflicts of Interest Policy](#) to learn more.

Insider Trading

A woman with dark hair pulled back, wearing brown-rimmed glasses, is looking intently at a computer screen. The screen displays a complex data visualization, likely a financial chart or table. The background is dark and out of focus, suggesting a professional office environment with multiple monitors.

As a global, publicly-traded company, FactSet is subject to the securities laws of the United States and the listing standards of the New York Stock Exchange and the NASDAQ. FactSet employees may, in the course of performing their day-to-day activities, learn about or gain access to material, non-public information about FactSet, its subsidiaries or affiliates, or its actual or prospective business partners. Material, non-public information (MNPI) is any non-public information that a reasonable investor would consider important in reaching an investment decision. Using this information to buy or sell securities or sharing this information with others violates our policies and may also violate law.

WHAT YOU NEED TO KNOW

- Employees with MNPI are prohibited from buying or selling, either directly or indirectly, FactSet securities; recommending or advising others to trade FactSet securities; or disclosing such MNPI to others.
- At FactSet, material nonpublic information might include the following:
 - Projections of future earnings or losses
 - News of a merger, acquisition, or disposition of assets or a subsidiary
 - Information about current subscription levels (ASV)
 - Information about significant incidents that may affect the company such as material data breaches or cyberattacks
- Employees engaged in illegal insider trading will be subject to immediate termination. FactSet's policy is to report such violations to the appropriate authorities and to cooperate fully in any investigation of insider trading.
- FactSet has additional, specific rules that govern trading in FactSet securities by directors, executive officers, and certain "restricted" employees.

WHAT TO WATCH OUT FOR

- Buying, selling, or gifting a security based on information you learned at work that you believe will affect the price of the security once that information becomes known to the public.
- Trading stock while in possession of MNPI, especially immediately prior to or in connection with a significant announcement or earnings release.
- Sharing non-public information about FactSet or other companies with friends, family, or business associates who might then use the information to buy or sell securities.
- "Stock tipping" or recommending FactSet stock to friends, family, or others when you might have MNPI about FactSet or a FactSet current or prospective business partner.
- Discussing MNPI in a public setting where others may overhear.



What Do You Think?

You learn on a conference call that FactSet is considering acquiring Company A. Can you share this information with a friend who could acquire stock in FactSet or Company A before the acquisition is announced publicly?



No. Sharing MNPI violates the Code and FactSet's Securities and Insider Trading Policy and may be illegal.



Learn more

You can refer to FactSet's [Securities and Insider Trading Policy](#) to learn more.

Government Interactions Policy

Government business often requires compliance with special rules and regulations, including rules relating to procurement, lobbying, disclosure, record-keeping, and gifts, hospitality, and entertainment. When interacting with governments and government officials, we must always act ethically, transparently and in compliance with these rules and our company policies. Any inquiries from government agencies or public officials, other than requests for information about our products that may occur in the ordinary course of business, should be immediately directed to the Government Affairs team or the Legal Department.

WHAT YOU NEED TO KNOW

- FactSet does business and interacts with government agencies, state-owned enterprises, and public officials in a variety of ways including, for example:
 - As a business providing service to government clients such as state-owned banks, public universities, and sovereign wealth funds
 - As a lobbyist employer and concerned corporate citizen petitioning to protect our interests
 - As a taxpayer and private employer with offices and employees in many countries around the world
- Government officials are broadly defined and include not only representatives of federal, state, local, and municipal governments, but also employees of government entities and their close family members, as well as anyone acting on their behalf.
- Business practices that may be acceptable when dealing with private companies – such as paying for meals or offering gifts, entertainment, or hospitality – may be unacceptable or illegal when interacting with government officials.
- Any inquiries, requests for information, or on-site visits from government officials (whether planned or unplanned) must be directed to the

Government Affairs team or the Legal Department immediately.

- Contact the Government Affairs team in advance if you are planning to engage with a government official for any reason other than in connection with the promotion or sale of our products in the normal course of business.

WHAT TO WATCH OUT FOR

- Offering travel, gifts, awards, or hospitality to a government official in violation of local regulations or FactSet's policies.
- Requests to hire a current or former public official (or a close friend or member of their family) while that official is in a position to influence FactSet business.
- Any activity that might be perceived as an attempt to improperly influence the actions or decisions of a government official.
- Attempts to deviate from a government's standard public procurement practices, even if condoned or requested by the government official involved.
- Inquiries, requests for information, surprise site visits or any other unsolicited contact from a government official or regulatory body, whether by phone, mail, email or social media – all such contacts must be referred to Government Affairs and/or the Legal Department.



What Do You Think?

You receive an unsolicited email from an individual claiming to represent a government agency. The email seems official, references a pending audit by the agency, and requests detailed information about FactSet's business and clients. What do you do?



It is uncommon but not unheard of for a government agency to contact FactSet, via email, phone, regular mail, or even through social media, and request information. Unless the government agency is a client or prospective client contacting us in the normal course of business, you should refer all such requests to Government Affairs or the Legal Department. A member of the Government Affairs or Legal team will help verify whether the request is legitimate and, if so, guide you in how to respond.



Learn more

You can refer to FactSet's [Anti-Bribery and Corruption Policy](#) and [Political Engagement Policy](#) to learn more.

Political Activities

We support the right and responsibility of all individuals to participate in the political process. FactSetters are encouraged to be politically active as individual citizens and support the political candidates of their choice – on their own time and at their own expense. Employees should avoid conflicts of interest and comply with all relevant campaign finance laws.

WHAT YOU NEED TO KNOW

- Consistent with applicable laws, FactSet may exercise its right to make its position known on any issues it deems relevant and appropriate.
- Holding or campaigning for political office must not create or appear to create a conflict of interest with your duties at FactSet. Before entering a campaign or accepting a political position or appointment, contact FactSet's Chief Compliance Officer so that they can review the situation and recommend the appropriate course of action to avoid any actual or perceived conflict.
- Do not donate FactSet funds, facilities, or other resources for the benefit of a political candidate, party, or campaign unless you are authorized to do so by FactSet's Chief Legal Officer.

WHAT TO WATCH OUT FOR

- Pressuring a colleague, customer, supplier, or other business partner to contribute to, support, or oppose any political candidate or party.
- Communicating personal political views and actions that might be attributed to FactSet.
- Soliciting political campaign contributions during work hours or using FactSet equipment, facilities, or other resources for the benefit of a political candidate.
- Contributing to a political campaign or making a charitable donation to win or retain business or to improperly influence someone.
- Participating in lobbying activities on behalf of FactSet without being expressly authorized to do so by FactSet's Chief Legal Officer.



What Do You Think?

I'd like to throw a fundraiser for the governor of my state to support her re-election campaign. Can I use FactSet office space for the event if I use my own money for the food and other supplies?



No. Using FactSet facilities for the benefit of a political candidate is an in-kind campaign contribution by FactSet and may be subject to campaign finance laws. You must obtain written permission from FactSet's Chief Legal Officer before proceeding.



Learn more

You can refer to FactSet's [Political Engagement Policy](#) to learn more.

Legal Notices

WAIVERS

Any waiver of this Code for FactSet executive officers or directors may be made only by the Board of Directors or the Board's Nominating and Corporate Governance Committee and must be promptly disclosed to shareholders on the FactSet website or in a Report on Form 8-K filed with the United States Securities and Exchange Commission.

EMPLOYEES REPRESENTED BY LABOR ORGANIZATIONS

No provision of this Code is intended to or shall be construed to supersede any applicable collective bargaining agreement or to restrict employees from engaging in protected activities under applicable laws. To the extent any provision of this Code is inconsistent with the terms of an applicable collective bargaining agreement, the collective bargaining agreement will control. Employees represented by a labor organization are encouraged to contact their labor organization to obtain a complete copy of the applicable collective bargaining agreement, including any provisions that might modify how this Code applies to them, and to discuss their representation rights, including any rights they may have to representation in disciplinary matters.

PROTECTED ACTIVITIES

Nothing in this Code or any other policies is intended to or shall be construed to prohibit employees (whether or not represented by a labor organization) from engaging in any conduct or activities protected by applicable law, including but not limited to protected activities under the National Labor Relations Act.