

FACTSET

Code of Business Conduct & Ethics

Updated November 1, 2025



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A great place to work

Our commitment to our clients, our culture, and our core values is the foundation of everything we do. Even as we lead through innovation – harnessing cutting-edge technologies to expand our clients' capabilities and grow our business – this commitment remains key to our success. We are poised for the future and excited for the opportunity to shape what comes next.



Letter from Sanoke

I am excited about the many opportunities that lie ahead for FactSet. Together, we are focused on executing our strategy, expanding our relationships with clients, and empowering the financial community to achieve its best work.

Our clients recognize that FactSet is well ahead of the competition in terms of the quality of our data, launching innovative AI products, and more, and we must continue to execute with urgency to maintain and widen our lead. At the same time, we must remain committed to our shared values and the standards set forth in our Code of Business Conduct and Ethics.

The Code is more than a set of guidelines; it ensures that integrity remains at the heart of every decision and interaction, helping us stay true to the core values that define FactSet—we are Future-Focused, Always Inclusive, Client-Centric, Tenacious, and Solution-Driven.

We have an incredible opportunity to drive success for our clients, our company, and our communities. Seizing this opportunity will take all of us working together, living our values, and upholding the highest standards of conduct.

Thank you for your dedication to FactSet, embodying our values, and continuing to do what's right.

Sanoke Viswanathan
CEO

“The Code is more than a set of guidelines; it ensures that integrity remains at the heart of every decision and interaction.”



Who We Are and Our Purpose



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

FUTURE-FOCUSED



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

ALWAYS INCLUSIVE



We foster an inclusive environment by actively listening to different perspectives, recognizing that great ideas can come from anyone, anywhere, at any time.

CLIENT-CENTRIC



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

TENACIOUS

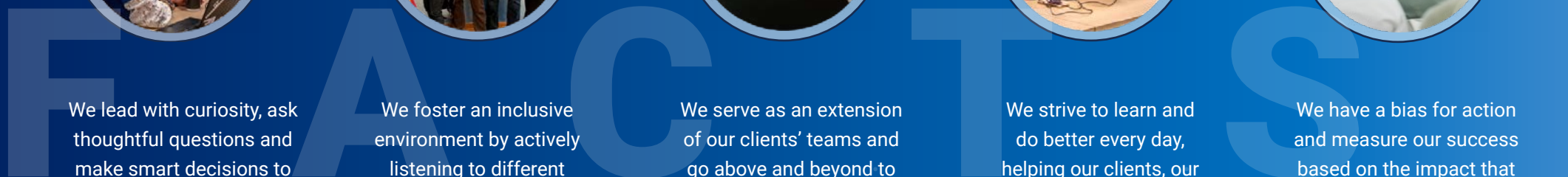


We strive to learn and do better every day, helping our clients, our communities, and each other grow.

SOLUTION-DRIVEN



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



[Learn more](#) Purpose and Values page

Inclusion

As a FactSet value, Always Inclusive is reflected in how we behave as a workforce. By fostering an inclusive culture, all colleagues feel more engaged and innovative – which enhances the performance of our workforce and the quality of our services to our clients. Our Business Resource Groups (BRG) are open to all employees and serve as a catalyst for connection, growth, and belonging. These groups foster engagement across all levels of our organization, ensuring every voice is heard and valued.



FACTSET
FAMILIES BRG



FACTSET
ASIAN BRG



FACTSET
LATINX BRG



FACTSET
MULTICULTURAL BRG



FACTSET
WOMEN'S BRG



FACTSET
BLACK BRG



FACTSET
VETERANS BRG



FACTSET
PRIDE BRG

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 on our Pillars of Service, partnering with best-in-class nonprofit organizations that provide meaningful opportunities for our people and community.



Learn more

Corporate Responsibility



DISASTER RESPONSE

Responding to community need when emergencies and disasters impact FactSet communities worldwide.



EDUCATE TO ELEVATE

Preparing young people for future success through education.



HUNGER ALLEVIATION

Providing nutritious food to our neighbors most in need.



SIGNATURE PARTNERS

Empowering future leaders in tech and finance to transform careers, lives, and the sector.



PROTECT OUR ENVIRONMENT

Preserving green spaces in the places where we live and work.

Our Commitment





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 reporting any and all violations or potential violations of applicable laws, the Code, or FactSet's policies 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, inclusive leadership, 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 violations or potential violations through appropriate channels, including FactSet's Chief Legal Officer, Chief Compliance Officer, an attorney in the Legal department, or a member of the Human Resources department.



PERSONAL COMMITMENT

To that end, all employees, directors, and officers will be asked annually to sign a Personal Commitment Statement, affirming their commitment to comply with the Code and report potential or suspected 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



SPEAKING UP

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

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
- 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.



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

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 to the extent possible.
- 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 prefer, you can raise a concern without providing your name or other identifying information. Please keep in mind, however, that you must provide sufficient detail in our report to allow us to 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 only on a “need-to-know” basis or as required by law.

WE PROHIBIT 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

[FactSet's Whistleblower and Anti-Retaliation Policy Page](#)

Ways to Speak Up



Online

<https://FactSetEthicsActionLine>.

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.



Phone

<https://FactSetEthicsActionLine>.

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.

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



People you can talk to

HUMAN RESOURCES

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

LEGAL AND COMPLIANCE

You can contact FactSet's Chief Legal Officer, Chief Compliance Officer, or any member of the Legal department or the Compliance team.

MANAGERS

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

Respecting Our People and Our Communities



FAIR EMPLOYMENT PRACTICES AND MAINTAINING A RESPECTFUL WORKPLACE



We know our people are our greatest asset. 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. Discrimination, harassment, bullying, and abusive conduct are prohibited at FactSet, and we require all employees, clients, and business partners to treat each other 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 to reach their goals and fulfill 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 accommodation is 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, making 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.



[Equal Employment Opportunity Policy](#)



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 department or Compliance team to register your concern.



[Anti-Discrimination and Harassment Prevention Policy](#)



[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 by implementing adequate safeguards and protections against occupational injuries, illnesses, and workplace violence for the benefit of our 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 overall sustainability goals.
- FactSet has programs in place to reduce greenhouse gas (GHG) emissions and waste generated across our offices.
- FactSet provides employees with regular training on health, safety, and physical security. 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 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?

We strive to maintain a safe and healthy workplace by implementing adequate safeguards and protections against occupational injuries, illnesses, and workplace violence for the benefit of our employees, business partners, visitors, and subcontractors.



[Environmental Policy](#)



[Occupational Health and Safety Policy](#)

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. FactSet supports and promotes a work environment where individuals are treated with respect, provided equal opportunities based on merit, and are free from all forms of discrimination.



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, racial and ethnic identities, sexual orientations, gender expressions, 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?

FactSet publishes a UK Modern Slavery Act Statement outlining our commitment to upholding human rights and the steps we've taken to prevent human trafficking in our operations and our supply chain. You can access FactSet's statement on the Investor Relations page of our public website at www.FactSet.com.



[Human Rights Policy](#)



[Supply Chain Code of Conduct](#)

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 all other applicable accounting principles and regulations are consistently followed. When in doubt, seek guidance from the Finance or Legal department.

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.
- Absence of clear controls or oversight on financial transactions, actions that exceed an employee's authority level, or efforts to bypass 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.



[Document Retention Policy](#)



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.



[Anti-Bribery and Corruption Policy](#)

A photograph of a server room with rows of server racks. The racks are illuminated with blue light. A person is visible in the background, looking at a rack. The overall scene is dimly lit with blue tones.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Intellectual property is the lifeblood of our business. It includes FactSet's self-developed software and information systems; FactSet-owned data, know-how, and trade secrets; our AI-powered natural language processing applications and tools; our logos, trademarks, tradenames, and brands; and any software, data, and other protected 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 as a prompt in a public large language model or to train a generative AI program without proper authorization



Learn more

[Use of Artificial Intelligence Tools](#)



Learn more

[Recording Meetings Policy](#)



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

[Media and Communications Policy](#)

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 or other confidential or sensitive data, you should:
 - Label it properly and use it only for the agreed business purpose. Never use it as a prompt in a large language model or to train a generative AI program without proper authorization
 - Share it only with those authorized individuals who have a legitimate business need for the information and/or who 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 or compromise of FactSet's information systems, report it immediately to a member of the Security Team.
- If you become aware of any unauthorized exposure of confidential or personal information, contact your direct manager or a member of the Legal department.

- Familiarize yourself with our internal and external data privacy policies and notices, which outline how we access, collect, and handle personal data. Do not access, process, handle, or store personal data in a way that is inconsistent with our customer commitments or our privacy policies and procedures.

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, confidential, or sensitive data to a third party who has not signed an appropriate non-disclosure agreement.
- Using personal information as a prompt in any large language model without proper authorization.
- 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 department or Compliance team 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 department or Compliance team involved.



Doing Business the Right Way



FAIR COMPETITION

We compete aggressively and win business fairly, based on the value of our products and our commitment to exceptional client service.

We 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 department 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 department 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



We prohibit bribery and corruption of any kind, including improper cash payments, kickbacks, or gifts offered to or received from a private client, government official, supplier, or another third party.

Facilitation payments to expedite routine administrative actions are 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 improperly influence a business decision.
- Follow FactSet’s Gifts & Business Entertainment Policy, which requires approval before giving or accepting gifts valued over US\$100.
- 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.
- 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 and applicable FactSet policies.
- Maintain accurate, detailed books and records of all financial transactions.

WHAT TO WATCH OUT FOR

- 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 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 US\$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 US\$100. 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 neither you nor your FactSet colleagues will be present to discuss business, build goodwill, or develop the business relationship.



Learn more

Anti-Bribery and Corruption Policy, Gifts & Business Entertainment Policy



Learn more

Supply Chain Code of Conduct

MONEY LAUNDERING, TERRORIST FINANCING, AND TRADE CONTROLS

We do 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 applicable sanctions or other international trade controls.

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 residents of certain countries, as well as with individuals or entities appearing on government watchlists that identify terrorists and international criminal organizations.
- 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 and monitoring clients' business activities in an effort to detect any illegal or unethical practices
 - 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 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 department if you encounter this situation.



[Know Your Client Policy](#)

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.

WHAT YOU NEED TO KNOW

- A conflict of interest exists when an employee's personal interests (whether social, financial, political, or otherwise) interfere or conflict with FactSet's interests or when an employee takes actions or has interests that make it difficult for them to perform their work for FactSet objectively and effectively.
- Conflicts of interest also arise when an employee (or employee's family member or personal contact) receives improper personal benefits of enrichment because 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. If potential conflicts arise, seek advice from Compliance or discuss your concerns with your manager. Many conflicts can be avoided or addressed if they are promptly disclosed and managed.

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



[Conflicts of Interest Policy](#)

INSIDER TRADING

We adhere to the listing standards of the New York Stock Exchange and the NASDAQ, and we comply with all applicable securities laws, including laws prohibiting insider trading. FactSet employees who learn about or gain access to material, non-public information about FactSet, its subsidiaries or affiliates, or its actual or prospective business partners may not use this information to buy or sell stocks and are prohibited from sharing this information with others. 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 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, MNPI 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 earning release.
- Sharing MNPI 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

[Securities and Insider Trading Policy](#)



GOVERNMENT INTERACTIONS

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 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 partner providing services to government clients such as state-owned banks, public universities, and sovereign wealth funds
 - As a lobbyist employer 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 hospitality or engaging in other legitimate business entertainment activities consistent with FactSet's [Gifts & Entertainment Policy](#) -- 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 team 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 team or the Legal department. A member of the Government Affairs team or Legal department will help verify whether the request is legitimate and, if so, guide you in how to respond.



Learn more

[Political Engagement Policy](#)



Learn more

[Anti-Bribery and Corruption Policy](#)

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 or engaging in political activities in ways 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

Political Engagement Policy

Legal Notices

WAIVERS

Any waiver of this Code for FactSet executive officers or directors requires the approval 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 they are 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.