

FactSet Code of Business Conduct & Ethics

Updated March 1, 2020



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I. Letter from Phil

At FactSet, our employees are the key to our success and the reason we continue to execute at a higher level than our competitors. With a culture rooted in client service and collaboration, we are consistently recognized as a great place to start and grow a career.

The FactSet Code of Business Conduct and Ethics embodies fundamental principles of ethical and legal conduct to ensure we continue to be guided by our values, no matter how quickly we grow or how large we become. As a global organization, operating in more than 20 countries, this revised Code helps all employees navigate the highly complex, regulated, and challenging business environment.

The FactSet Code of Business Conduct and Ethics applies to all employees, officers and directors. Although we span the globe, speak different languages and represent many cultures, we are united in our vision to unlock smarter investment decisions and insights for our clients through superior analytics, content, technology, and service. The Code helps ensure that our sense of integrity is at the forefront of each business transaction conducted at FactSet.

Thank you for your continued commitment to FactSet, your colleagues, our clients, and shareholders by upholding the Code of Business Conduct and Ethics.



A handwritten signature in black ink that reads "Phil Snow". The signature is written in a cursive, flowing style.

Phil Snow

CEO

II. Our Commitment: Getting Started

Living our Commitment. The purpose of the FactSet Code of Business Conduct and Ethics is to reinforce our commitment to acting with integrity toward each other, the Company, the market, and our clients and shareholders. We as individuals are accountable for making good decisions and for the outcome of those decisions. The Code provides guidance for our decisions.

This Code cannot cover every situation you may encounter or answer every question you may have. When it does not, your good judgment and the spirit of the Code must prevail. If the best course of action is not clear to you, do not hesitate to raise any questions or issues with your manager, the Human Resources Department or the Legal Department.

Accountability and Responsibility. All FactSet directors and employees, including managers and executives, must follow the Code as well as abide by all federal, state, local, and foreign laws. In addition to abiding by the Code and all applicable laws, all employees must, through their actions, lead by example and demonstrate the importance of doing business legally, ethically, and with integrity. Our colleagues look to us for answers and each of us must act as a leader by taking responsibility for everything we do.

For managers, leading by example is critical, as is being available for employees who have ethical questions or concerns or wish to report potential violations. Managers must ensure that all laws and the Code are enforced through appropriate disciplinary measures. If a manager suspects the law or the Code has been violated, or an employee reports a potential violation to a manager, the manager should address the matter immediately, including reporting the allegations to the Human Resources Department or Legal Department. The manager may also file a report anonymously via the FactSet Ethics Action Line available at <https://factset.ethicspoint.com>. Questions about compliance with the law and the Code and appropriate disciplinary measures should be directed to the Human Resources Department or Legal Department. Violations against the letter or spirit of the Code will be addressed with corrective action on a prompt and consistent basis, up to and including termination of employment and a requirement to reimburse the Company for any monetary damages caused by the violation.

Personal Commitment. FactSet's integrity is the cornerstone of our business success. The character and integrity that defines FactSet is a product of the individuals who work here. Each of us must make a personal commitment to continue to embody and model lawful and ethical conduct in our business practices. Each employee and director will periodically be asked to acknowledge the Personal Commitment Statement, at the end of the Code, acknowledging or reaffirming that you have read the Code and will undertake to follow it.

Your Duty to Speak Up. FactSet cannot live up to its commitment to act with integrity if we, as individuals, do not speak up when we should. In addition to knowing the legal and ethical responsibilities that apply to your job, you should speak up if:

- You are unsure of what the right thing to do is and need advice.
- You believe someone else, acting on behalf of FactSet, is doing or is about to do something that violates the law or the Code.
- You believe you may have violated the law or the Code.

In addition, employees, officers, and directors are expected to cooperate in internal investigations of allegations of violations of the Code. In the course of your employment you may be required to undergo an internal or external examination, such as the CFA exam, Internal Client Solutions certification, or other professional examinations or certifications. You are expected to engage in all tests and certifications with integrity; cheating on an examination may be cause for discipline.

Resources. No guidelines, no matter how detailed, can possibly anticipate all of the challenges you may face on the job. That is why it is important, when you are unsure of the right thing to do, to emulate the spirit of the Code, seek advice from your manager or another appropriate person and utilize the resources available to you throughout the Code. Supplementary information on a number of topics discussed in the Code may be found by referring to the applicable Company policy, which may be accessed via the Legal Department's page on the intranet. Contact the Legal Department if you need assistance finding any Company policy. If your questions are not fully addressed by the

resources above, your next step should be to discuss your issues with your manager or someone in the Legal Department or Human Resources Department.

No Retaliation. Employees should report violations of laws, rules, regulations, or this Code to appropriate personnel. To encourage employees to report such violations, the Company will not allow retaliation for reports made in good faith. You may speak with your manager, to the Compliance Officer, someone in the Legal Department or Human Resources Department. You may also file a report anonymously through the FactSet Ethics Action Line, accessible via the internet at <https://factset.ethicspoint.com>, where you will find an online intake form and toll free phone numbers for your jurisdiction. Also refer to our Whistle-blower and Non-retaliation Policy.

Waivers. Any waiver of this Code for 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 our Company website or in a Report on Form 8-K filed with the Securities and Exchange Commission.

Stop, Reflect and Always Ask.

- Does my decision make me uncomfortable because it may be illegal or violate the Code?
- Will I regret my decision tomorrow?
- Will my clients, colleagues, friends or family disapprove or be disappointed?
- Would I feel embarrassed if my action were reported in the media?

If the answer to any of these questions is yes, seek advice from your manager, the Human Resources Department or Legal Department. You can also send an email to Compliance@factset.com. Remember that these principles apply at all Company-sponsored events and parties, not just at the office. Have fun responsibly and act with integrity.

III. Commitment to Our Company

A. Conflicts of Interest

Principle: Avoid actual and potential conflicts of interest. Do not pursue personal interests at the expense of FactSet.

A “conflict of interest” exists when a person’s private interest, whether personal, social, financial political, or otherwise, interferes in any way with the interests of the Company. A conflict situation may arise when an employee takes actions or has interests that may make it difficult to perform his or her work at FactSet objectively and effectively. Conflicts of interest also arise when an employee or a member of his or her family receives improper personal benefits as a result of his or her position in the Company or gains personal enrichment through access to confidential information. We expect our employees to be free from influences that conflict with the best interests of FactSet or might deprive them of their undivided loyalty in business dealings. Even the appearance of a conflict of interest where none actually exists can be damaging and should be avoided. Certain financial transactions between the Company and its officers, directors, and individuals owning more than five percent of the Company’s common stock and the families of those stockholders may need to be disclosed to the Securities and Exchange Commission (“SEC”). These individuals are referred to by the SEC as “Related Parties.” If you believe you are a Related Party and have engaged in a significant financial transaction with the Company, please disclose the transaction to the Legal Department or Accounting Department. Please note that such a transaction does not necessarily constitute a violation of the Code, so long as you have disclosed it.

The following are examples of situations that may, depending on the facts and circumstances, involve conflicts of interest.

- Employment by, consulting for or service on the board of, a competitor, client, vendor or service provider;
- Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business with or competes with us;
- Soliciting or accepting gifts, favors, loans or preferential treatments from any person or entity that does business with or seeks to do business with us;
- Soliciting contributions to any charity or for any political candidate from any person or entity that does business with or seeks to do business with us;
- Taking personal advantage of corporate opportunities;
- Other employment without written permission from a manager; and
- Conducting our business transactions with your family member or a person who shares your household or a business in which you have a significant financial interest.

To determine whether there is a potential conflict of interest, ask:

- Do I have a significant financial interest in a company that does business with FactSet?
- Do I spend time on outside work during my normal FactSet working hours?
- Do I accept valuable or frequent gifts from suppliers, clients or competitors? If so, could these gifts be influencing my decision-making ability?
- Am I in a position to hire or directly supervise a family member or close friend?

Conflicts of interest can arise in many common situations, despite one’s best efforts to avoid them. Employees are encouraged to seek clarification of, and discuss questions about, potential conflicts of interest with FactSet’s Legal Department or Human Resources Department. Any employee who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate persons within the Company. Please note also that you may not take on any job outside FactSet without your manager’s prior written authorization.

Caution: The mere appearance of a conflict of interest can cause great damage to your reputation or that of the Company.

B. Corporate Opportunity

Principle: Employees are expected not to take personal advantage of opportunities presented to them or discovered by them as a result of their positions with the Company. For example, while employed at FactSet, you should not obtain a material ownership interest in the business of any of the Company's clients, competitors or other business partners, act as an officer or director of, or perform work any such Company without the consent of your manager or the General Counsel, as appropriate.

Employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Employees are prohibited from (1) taking for themselves personally opportunities that are discovered through the use of corporate property, information or their positions, (2) using corporate property, information or their positions for personal gain and (3) competing with the Company directly or indirectly.

If you are unsure whether your contemplated activity would constitute an appropriation of a corporate opportunity to personal advantage in violation of this portion of the Code, please consult with your manager or FactSet's Legal Department.

IV. Commitment to the Marketplace

A. Fair Dealing

Principle: We seek to excel while operating honestly and ethically, never through taking unfair advantage of others.

FactSet's goal is to succeed in business fairly and honestly. Our policy is to compete vigorously, aggressively and successfully in today's increasingly competitive business climate and to do so at all times in compliance with all applicable competition, fair dealing and antitrust laws in all the markets in which we operate. Each employee should endeavor to deal fairly with the Company's customers, suppliers, competitors and other employees. FactSet does not endorse unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practices. All employees and contractors working on FactSet's behalf are expected to deal fairly with our clients, vendors, other employees and anyone else with whom you have contact in the performance of your job.

B. Antitrust

Principle: Avoid improper agreements or arrangements with competitors.

The antitrust laws of many jurisdictions are designed to preserve a competitive economy and promote fair and vigorous competition. We are all required to comply with these laws and regulations. Employees involved in marketing, sales, vendor relationships, contracts or in discussions with competitors have a particular responsibility to ensure that they understand our standards and are familiar with applicable competition laws. Antitrust laws are designed to protect the competitive process and generally prohibit agreements with competitors, whether formal or not, that impede competition or injure customers, including price fixing and the allocation of sales territories. Employees who have regular contact with our competitors through redistribution arrangements or otherwise should be especially cautious in this regard. Certain types of information, such as pricing (wholesale and resale), territories covered and profitability, as well as the development of certain product features should not be shared with competitors, whether in a casual or business setting. As a general rule, to avoid the perception of unlawful conduct, you should avoid discussing the following subjects with competitors:

- Prices of our products and services;
- Production costs;
- Engineering and Product Development;
- Distribution and licensing channels;
- Details regarding our products and services;
- Proposals or bids for business;
- Financial position of the Company;
- Sales territories and responsibilities; and
- Clients.

If a competitor attempts to review any of these topics with you, you should stop the interaction immediately.

Since these laws are complex and can vary from one jurisdiction to another, employees should seek the advice of the Company's Legal Department when questions arise.

Caution: Even a casual conversation with a competitor may be construed later as an attempt to engage in an anticompetitive practice. Violations of antitrust laws can result in severe penalties, both to the Company and the individual.

C. Competitive Intelligence

Principle: Compete vigorously but ethically. Because the financial information market is a competitive one, it is necessary to gather competitive information fairly and legally.

You are free to gather competitive intelligence from public sources of information such as web sites, published articles, advertisements, public presentations and customer conversations. You should only accept competitive intelligence when you reasonably believe the receipt and use of the information does not violate any entity's confidentiality obligations. You should never use or ask anyone else to use unlawful or unethical means such as misrepresentation, deception, theft, spying or bribery to acquire competitive intelligence. *It is a violation of FactSet's policy to use an unauthorized password of any kind.* In addition to your failure to comply with this Code, you may become subject to the Computer Fraud and Abuse Act as well as other state and federal statutes. If you are unsure about the legitimacy of information, please consult with your manager or the FactSet Legal Department. Please also see the Information Security module in our LegalDirect online training program.

D. Marketing Integrity

Principle: Focus on the strengths of FactSet's products and services rather than criticizing those of our competitors.

FactSet believes in fair competition. Although comparative marketing is generally acceptable in the United States, a FactSet employee should not inaccurately criticize a competitor's products or services. Rather, focus on the strengths of the FactSet products and services. There are laws that apply to our marketing activities, and under these laws, unfair or deceptive acts or practices in commerce are illegal and prohibited. Unfair or deceptive acts include the following:

- False or misleading advertising or any other form of misrepresentation made in connection with sales or servicing clients;
- The use of lotteries, raffles, sweepstakes in the sale of products and services not in accordance with local regulations (contact the Legal Department before using any of these as part of a marketing or sales strategy); and
- Inaccurate comments about our competitor's products and services.

Caution: Inaccurate statements about a competitor's products or services may result in claims of libel, slander or defamation as well as other potential claims.

E. Gifts and Entertainment

Principle: You may offer or receive business gifts, meals, services and entertainment within the guidelines below.

Business gifts and entertainment are designed to build goodwill and sound working relationships among business partners. A problem would arise if (1) the receipt by one of our employees of a gift or entertainment would compromise, or could be reasonably viewed as compromising, that individual's ability to make objective and fair business decisions on behalf of the Company or (2) the offering by one of our employees of a gift or entertainment appears to be an attempt to obtain business through improper means or use improper means to gain any special advantage in our business relationships, or could reasonably be viewed as such an attempt. Employees should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties. Our clients, vendors and the general public should know that our employees' judgment is not for sale. This principle, which does not prohibit reasonable client or prospect entertainment, applies to our transactions everywhere in the world, even where the practice is considered "a way of doing business." Under some statutes, such as the United States Foreign Corrupt Practices Act, giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction.

Never give a gift in order to influence the decisions of an individual or company. Never solicit a gift. Never accept a gift that could influence your decisions. Business gifts, meals, services or entertainment are acceptable if they conform to these general guidelines:

Gifts and Services:

- Have a value of \$100 or less;
- Are relatively infrequent;
- Comply with applicable laws and are not given or received with the intent of influencing a decision; and
- Would not embarrass FactSet or the person giving or receiving the gift if publicly disclosed.

Meals and Entertainment:

- Infrequent, not extravagant in nature and for the express purpose of fostering a business relationship;
- Comply with applicable laws and are not given or received with the intent of influencing a decision; and
- A representative from each company is present.

Caution: Inappropriate or excessive gifts, to or from individuals outside of FactSet, can create the appearance of a conflict of interest or undue influence. The onus is on the individual employee to use good judgment and ensure there is no violation of these principles. If you have any question or uncertainty about whether any gift or proposed gift is appropriate, please contact your manager or the Legal Department.

V. Commitment to Our Clients

FactSet wins and maintains client relationships based on the quality and value of its products and services as well as the quality and value of its employees.

A. Sales and Client Service Practices

Principle: Be honest and fair in your business dealings with clients and potential clients.

Caution:

- **False and Deceptive Statements:** Do not make false or deceptive statements about FactSet products or services or those of competitors, in your business dealings with clients and potential clients.
- **Illegal Bundling of Products and Services:** If any company, whether FactSet or one of its competitors, has a dominant market position for one particular product or service, that company may not force a client or potential client to buy another product or service because it is bundled with the first product or service.
- **License Agreements:** Always use the standard FactSet Master Client License Agreement or the standard FactSet Master Distribution Agreement when selling FactSet products and services, and abide by the pricing guidelines established by your sales team.
- **Client Information:** FactSet has the responsibility to protect and use properly the personal data it has access to from current and potential clients, in accordance with applicable privacy laws and regulations.

B. Contracting on Behalf of FactSet

Principle: Document business relationships with clients and vendors in written agreements in order to build strong business relationships, set the parties' expectations accurately and ensure accurate Company record-keeping.

- **Authorization:** Agreements may be signed only by a FactSet vice president or other designated authorized individual. If you are unsure whether you have authority to sign an agreement, please contact the Legal Department or your manager before signing anything. You may incur personal liability if you sign documents without proper authorization.
- **Contracts or Agreements:** Properly written contracts document business relationships, define the rights and obligations of FactSet and its clients and business partners, establish protections against liability, and provide tools for handling disputes. Contact the Legal Department to determine if your contract requires legal review. You may not enter any agreement for any activity that violates the law.

Caution: The failure to document a business relationship with a client or vendor may result in lost revenues to FactSet, the loss of a necessary product or service or a dispute.

VI. Commitment to Shareholders

As a public company traded on the New York Stock Exchange and NASDAQ, FactSet is subject to the securities laws of the United States and the Listing Standards of the NYSE and NASDAQ.

A. Insider Trading

Principle: Do not purchase or sell a company's securities, or tip someone else to do so, if you are in receipt of material nonpublic information about that company.

There are instances where our employees have information about the Company, its subsidiaries or affiliates or about a company with which we do business that is not known to the investing public.

If a reasonable investor would consider the information important in reaching an investment decision, then the employee who holds the information must not buy or sell Company securities, nor provide such information to others, until such information becomes public. Further, employees must not buy or sell securities in any other company about which they have material nonpublic information, nor provide such information to others, until such information becomes public.

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 of a subsidiary;
- Information about current subscription levels (ASV)

Information becomes public after the following occurs, (i) the information is released through Nasdaq GlobeNewswire; and (ii) the investing public has had an opportunity to become familiar with the information. Please contact the Company's Chief Marketing Officer if you are unsure whether any piece of information is public.

The use of material nonpublic information in the above manner is not only illegal, but also unethical. Employees who involve themselves in illegal insider trading (either by personally engaging in the trading or by disclosing material nonpublic information to others) will be subject to immediate termination. The Company's policy is to report such violations to the appropriate authorities and to cooperate fully in any investigation of insider trading.

The Company has additional, specific rules that govern trades in Company securities by directors, certain officers and certain employees. Please see the Insider Trading module in our [LegalDirect](#) online training program. Also, please review [FactSet's Trading policy](#) on the intranet.

B. Confidential Information

Principle: Protect the confidentiality of nonpublic or sensitive information about FactSet, FactSet's clients and others.

FactSet Confidential Information: One of FactSet's most important assets is our confidential information. Confidential information is information a person would consider private, which is not common knowledge outside of the Company and which a FactSet employee has learned as a result of his or her employment at FactSet. All employees have access to various types of confidential information. Each employee has an obligation to use at least a reasonable degree of care, the degree of care that a prudent person would take, to safeguard such information. Confidential information may include business, marketing and service plans, financial information, product architecture, source and object codes, engineering ideas, designs, databases (whether proprietary or third party), pricing strategies and lists, client and prospect lists, personnel data and personally identifiable employee information and information provided to us or uploaded into our systems by our clients. Such information may be protected by patent, trademark, copyright or trade secret laws.

You may also have access to client confidential information. We have a fiduciary duty and contractual obligation to keep client information secure and use it appropriately. You must protect the confidentiality of any nonpublic information our clients share with us, including information about their customers' investments.

Do not assume that all FactSet employees, contractors or business partners should have equal access, or any access at all, to various types of information. Confidential information, whether belonging to a client or anyone else,

should only be disclosed on a need to know basis. If you disclose confidential information appropriately, you should be sure the recipient understands his or her responsibility to safeguard the information and maintain its confidentiality. You may need to secure any new undertaking in a written confidentiality agreement. Consult the Legal Department if you have any questions.

Confidential information is often involved in our daily work, so you should take care not to disclose confidential information inadvertently. Use caution when using the telephone, facsimiles, email or any other electronic means of storing and sending information and be mindful of email or phone scams (also known as phishing) that may ask you to reveal confidential information. If you receive an email or phone call that seems suspicious to you, contact your manager or the FactSet Legal Department before revealing any information. Do not discuss confidential information in public places where others may overhear (such as elevators, airplanes and restaurants) and even semi-public spaces such as our cafeteria or other areas open to guests visiting our offices. Dispose of materials containing confidential information in a responsible way (through shredding or secure destruction). Store materials containing confidential information securely. To help you keep information confidential, templates for confidentiality agreements are available on our intranet. These agreements should be used before initiating discussions with vendors, prospective clients, and other parties that may need access to our confidential information.

The obligation not to disclose FactSet confidential information and our clients' confidential information continues with you even after you leave FactSet. As such, we also respect the obligations of confidence our employees may have from prior employment, and ask that employees not reveal confidential information obtained in the course of their prior employment. FactSet employees must not be assigned to work in a job that would require the use of a prior employer's confidential information. Please see the Information Security module in our [LegalDirect](#) online training program. Also, please review [FactSet's Information Security policy](#) on the Company's intranet.

Communicating with the Media, Public, Clients, and Investors: All requests from the press and financial analysts should be referred to the Company's head of Investor Relations or Chief Marketing Officer, as applicable. As described in the Company's Media Policy on the legal page of our intranet, only the appropriate spokesperson has the authority to make public any information about FactSet that may be significant to the financial markets. FactSet's head of Investor Relations or Chief Marketing Officer should be consulted.

- **Financial News:** Only the appropriate spokesperson may release news that can be expected to influence investors or have an impact on the market for FactSet stock, including financial projections, orders, revenue and earnings. Remember that many of our clients are also our investors and any questions about our financial status should be referred to the designated spokesperson.
- **Quiet Periods:** No information may be released during a "quiet period."
- **Press Releases:** Press releases including material nonpublic information are to be made only through designated representatives with the prior approval of the Company's marketing department or General Counsel as appropriate.
- **Interviews and Comments:** You may not grant interviews or provide comments to the press or media without the prior consent of the designated Company spokesperson. Please refer any such requests to the designated spokesperson.
- **Social Media Postings:** Posting information on the internet or communicating via your personal social media accounts or blogs is the same as "speaking to the media." FactSet employees should not use these forums to discuss their opinions about the Company or respond to questions or comments about the Company. You may not discuss our business in any way in any social media whether you use your own name or a pseudonym. You may not create any external groups or profiles that could be viewed as authorized by FactSet, or represent yourself in any social media posting as an official FactSet spokesperson. You may not use FactSet's name or logo in the name or description of any online group that you create. If you want to use your Twitter, Symphony, or LinkedIn or other social media platform account for marketing to prospective clients on behalf of FactSet, you must obtain prior approval from your manager. You must also identify yourself as a FactSet employee in your profile and remember that your comments via that platform constitute a representation of FactSet. Please review our Social Media Guidelines and Q&A on Social Media Guidelines on our intranet prior to posting anything about FactSet, other than identifying yourself as a FactSet Employee, on any social media platform.

Caution: Inappropriate disclosures of nonpublic or sensitive information can weaken our competitive position, jeopardize our product development efforts and even result in violations of securities regulations.

C. Corporate Assets

Principle: FactSet assets are to be used to perform your job function, not for personal benefit.

Company assets, such as a laptop or cell phone, are provided to help all of us perform our jobs. Each of us also has an obligation to prevent the Company's property from loss, damage, misuse, theft, embezzlement or destruction. Theft, loss, misuse and waste of assets have a direct impact on our profitability and may jeopardize the future of the Company. Any situations or incidents that could lead to the theft, loss, misuse or waste of Company property should be reported promptly to your manager, the Legal Department or any other appropriate department (depending on the assets at issue).

All Company assets should be used for legitimate and authorized business purposes. You should not access systems or information unless you have been authorized to do so, and the extent of your access must be consistent with the scope of your authorization. Employees should be mindful that the Company reserves the right to access, review, monitor and disclose any information transmitted, received or stored using FactSet equipment or resources, (including, for example, FactSet-owned computers and mobile phones), with or without an employee's or third party's knowledge, consent or approval. In addition, you should have no expectation of privacy in any messages or records created or transmitted by FactSet resources, regardless of whether you are transmitting or receiving messages or other information via an account to which you have a personal password, such as your personal email account, Facebook account, Twitter account, or other social media platform. All Company-related communications should take place using FactSet approved applications. You should not conduct work-related communications over non-FactSet authorized or deployed applications or devices. Consistent with any applicable local laws, if you use your own mobile phone or other device to store or access FactSet email or other corporate data, you should have no expectation of privacy in that device, and it will be subject to the same security and data management practices as a FactSet-owned device. For example, FactSet may retrieve, erase, or wipe FactSet data from devices that you own, as permitted by applicable law. You may not forward FactSet emails to your personal accounts or download information to your personal accounts; be aware that your FactSet work emails are Company property.

You will be required to return all Company assets if you leave FactSet, and FactSet may require you to stop using or return Company assets at any time even while you are a FactSet employee. FactSet may inspect persons or property on FactSet premises at any time and without notice, subject to applicable law. Any misuse or suspected misuse of FactSet assets should be reported immediately to your manager, the Legal Department or any other appropriate department (depending on the misuse at issue).

It is a violation of FactSet policy to participate in an expert network. Your knowledge of FactSet and its industry should not be shared for your personal profit through compensation by a third party expert network firm. Such conversations could put you in jeopardy of engaging in tipping and inadvertently providing inside information in violation of securities laws.

You may never use FactSet resources in violation of the law. You may not use any FactSet resource to create, transmit, store, or display messages, images or materials that are for personal gain, solicitations, chain letters, or threatening, sexually explicit, harassing, or otherwise demeaning to any person or group. You also may not use FactSet resources in any way that would violate the intellectual property rights of any third party. For example, downloading, duplicating, or redistributing copyrighted material, such as music, movies, images, or software, may violate the intellectual property rights of their owners and may be illegal. Such misuse of Company resources is subject to corrective action, up to or including termination of employment.

Company assets include, but are not limited to, the following:

- Cash;
- Office supplies;
- Emails;
- Computer Code;
- Computers and software licenses;
- Facsimile machines;
- Technology;
- Telephones;
- Physical property;
- Client information;
- Third party data supplier information;
- Client lists and information; and
- FactSet's name and logo and other forms of intellectual property.

D. Intellectual Property

Principle: We are all responsible for protecting FactSet's intellectual property from misuse and unauthorized disclosure.

FactSet's intellectual property is essential to maintaining our competitive advantage in the marketplace. FactSet's intellectual property includes the FactSet name, logo, inventions, processes, innovations, content and software.

- **Ownership:** FactSet generally owns the intellectual property that you generate as a FactSet employee, using FactSet resources. You may not privately protect or exploit intellectual property generated during the course of your employment. If you work in a jurisdiction that allows you to claim ownership, you will be required to transfer ownership to the Company.
- **Third Party Intellectual Property:** You must respect the intellectual property of third parties. In order to use the intellectual property of a third party, FactSet must seek and obtain the appropriate permissions. Be aware that many websites with publicly available content include terms and conditions prohibiting use of the content for commercial purposes, so please contact the Legal Department before using this type of content on FactSet's behalf. Unless proper permission has been obtained, you may not copy text, code, artwork, images, photographs, videos, music, web pages or other forms of expression, whether they are in hard copy or electronic media. In order to avoid trademark infringement claims, contact the Legal Department before using any new name, slogan or mark for any product or service (whether to be used internally or externally). Please review the Intellectual Property module in our [LegalDirect](#) online training program.

What you can do to help protect FactSet's intellectual property:

- Report any unauthorized use of FactSet's copyrights, patents, trademarks or trade secrets to your manager and the Legal Department;
- After consulting the Legal Department, place appropriate copyright notices on all FactSet materials, information, products, services and other documents or products intended for public distribution;
- Do not copy or distribute software or related documentation without ensuring that the licensing agreement permits copying or distribution; and
- Follow your department's guidelines on the proper creation of intellectual property, such as software, content databases and designs.

What you can do to help protect third parties' intellectual property:

- Get written permission to use a third party's copyrights, patents, trademarks or other intellectual property. In order to use another Company's intellectual property, you must obtain a license or other permission; and
- Do not make any copies of or publish any copyright protected materials until we have obtained permission from the holder and determined that the copying or publishing is legally permitted.
- Do not comply with clients' requests to replicate competitors' templates or charts without first confirming with your manager or the FactSet Legal Department that fulfilling the request will not result in the infringement of third party intellectual property.

Caution: Inappropriate disclosures of nonpublic or sensitive information can weaken our competitive position and jeopardize our product development efforts.

VII. Commitment to Compliance

A. Compliance with Laws, Rules and Regulations

Principle: It is FactSet's policy to comply with all applicable laws, rules and regulations.

Each employee and director bears the personal responsibility of adhering to the standards and restrictions imposed by those laws, rules and regulations.

B. Money Laundering

Principle: FactSet will not support, facilitate or condone money laundering and we will help Governments prevent illegal trade involving our Company's products.

Money laundering is a process by which individuals or entities try to conceal illicit funds or otherwise make the source of their funds look legitimate. FactSet is committed to its anti-money laundering policies which utilize certain procedures to avoid receiving cash or cash equivalents that are the proceeds of a crime.

FactSet encourages all of its employees, particularly those with client contact, to "know your client" in order to ensure FactSet does business only with firms that share our standards for compliance and integrity. "Know your client" involves the following:

- Assessing the integrity of potential clients;
- Communicating with clients about our compliance expectations;
- Continuously monitoring clients' business practices;
- Refusing to do business with or provide assistance to those clients suspected of wrongdoing related to our products; and
- Reporting any suspicious transactions or activities by any customer to your manager and the Legal Department.

Caution: Severe civil and criminal penalties on both the individual and company levels.

C. Record Retention and Accuracy

Principle: Maintain records accurately and as required by law and retain all records in accordance with FactSet's record retention and disposal procedures.

No record, including originals, drafts and duplicates may be destroyed, altered or removed from any file or premises where it is stored other than in accordance with FactSet's record retention and disposal procedures. Regular document destruction must stop immediately if you are aware of a legal request for such documents. Subject to local requirements, you may keep active records in a way that suits your daily business needs.

The term "records" means any medium, whether in paper or electronic form, that memorializes information created or used by the Company. Records include, but are not limited to, the following items: electronic as well as hard copy documents of all types generated or received, handwritten notes, memoranda, calendars, email, instant messages, text (SMS) messages, voicemail messages, video files, audio files, electronic images, spread sheets, facsimiles, financial statements, analyses, reviews, estimations, evaluations, reports, studies and correspondence. Properly maintaining corporate records is important. In accordance with these policies, in the event of litigation or governmental investigation, please consult the Company's Legal Department. Please also consult the Records Retention Policy on the Company's intranet.

Caution: Any unauthorized destruction, alteration or permanent removal of a document from its proper place, is a violation of FactSet policy and, in many cases, illegal. Employees doing so are subject to strict disciplinary action, including termination, as well as prosecution under the law.

Accuracy of Records: FactSet's business records are used to provide reports to management, shareholders and government agencies. Therefore, it is critical that our business records completely and accurately reflect FactSet's transactions. This includes invoices, bills, expense reports, payroll and benefits reports, performance evaluations, records of product development and other materials.

All financial statements, books and records, service orders and accounts of the Company must accurately reflect transactions and events and conform both to legal requirements and accounting principles, and also to FactSet's system of internal accounting. As a FactSet employee, you have the responsibility to ensure that false or intentionally misleading entries are not made by you, or anyone who reports to you, in the Company's business records. Regardless of whether reporting is required by law, dishonest reporting within the Company, or to organizations or people outside the Company, is strictly prohibited. All officers and employees of the Company who are responsible for financial or accounting matters are required to ensure the full, fair, accurate, timely and understandable disclosure in all periodic reports and required filings with the Securities and Exchange Commission. This commitment and responsibility extends to the highest levels of our organization, including our chief executive officer, chief financial officer and chief accounting officer.

In addition:

- No employee may take or authorize any action that would cause our business records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC or other applicable laws, rules and regulations;
- All employees must cooperate fully with our Finance and Legal Departments, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with accurate information; and
- No employee should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports, accurate in all material respects.

Any employee who becomes aware of any departure from these standards has an affirmative obligation to report such knowledge promptly to a manager, the Legal Department, any other appropriate department or officer, or, regarding financial or accounting issues, anonymously via the whistleblower hotline at 1-866-220-2041.

All employees, officers and directors are encouraged to report any concerns that they may have regarding the accounting, internal accounting controls, or auditing matters of the Company directly to the Audit Committee. All submissions by employees of concerns regarding questionable accounting or auditing matters will be received by the Audit Committee on a confidential and anonymous basis through the whistleblower hotline (1-866-220-2041). We want to assure all of our employees, officers and directors that they have no need to fear retaliation or retribution for having acted in good faith in reporting their concerns.

VIII. Commitment to One Another as FactSet Employees

FactSet recognizes that its people are the foundation of its success. We are committed to treating all employees with honesty, fairness and respect. We value cooperation, teamwork and trust. Hostility, discrimination and harassment are offensive and illegal; they will not be tolerated at FactSet.

A. Equal Opportunity and Fair Treatment

Principle: Recruit, hire, develop, promote and discipline employees without regard to race, sex, color, religion, gender, gender identity or expression, sexual orientation, age, national origin, citizenship, marital status, pregnancy, disability, or veteran status, providing reasonable accommodations where necessary to ensure fairness and non-discrimination.

FactSet specifically prohibits discrimination in any of the following:

- Recruiting, hiring and training;
- Promotions, pay and benefits; and
- Transfers and workforce reductions.

All human resources policies and activities of the Company intend to create a respectful workplace in which every individual has the incentive and opportunity to reach his or her highest potential.

We are firmly committed to providing equal employment opportunities to all individuals and will not tolerate any illegal discrimination or harassment of any kind. Examples include derogatory comments based on age, race, gender, gender identity or expression, ethnic characteristics and unwelcome sexual advances or comments. This policy applies to both applicants and employees and in all phases of employment, including recruiting, hiring, placement, training and development, transfer, promotion, demotion, performance reviews, compensation and benefits, and separation from employment.

All levels of supervision are responsible for monitoring and complying with FactSet's policies and procedures for handling employee complaints concerning harassment or other forms of unlawful discrimination. Because employment-related laws are complex and vary from state to state and country to country, managers should obtain the advice of the Director of Human Resources or the General Counsel in advance whenever there is any doubt as to the lawfulness of any proposed action or inaction.

B. Workplace Harassment

Principle: Provide a work environment that is free of verbal, physical or visual harassment regarding racial, ethnic, religious, physical or sexual characteristics, sexual orientation or any other prohibited factor.

Reporting Harassment: Harassment in the workplace is prohibited and will not be tolerated. Conduct that creates an uncomfortable or hostile work environment, such as unwelcome advances or requests for sexual favors, inappropriate comments, jokes, intimidation or physical contact are forms of workplace harassment. Employees who engage in harassment of other employees are subject to corrective action, up to and including termination of employment. Managers are responsible for maintaining a harassment free environment that is free of retaliation. See FactSet's Anti-Harassment Policy on the Legal Department's page of our intranet for additional details.

FactSet encourages open communication regarding questions, concerns, problems or complaints involving discrimination or harassment. Here is what you can do:

- Talk to your manager, the head of your office or someone in the Human Resources Department of your office; or
- Contact the Human Resources or Legal Departments at Corporate Headquarters in Norwalk, CT.

Caution: FactSet may be held responsible for the harassment or discrimination of employees by managers, other employees or non-FactSet employees if the Company knows (or should have known) about the behavior and failed to take appropriate action.

C. Prohibition of Weapons in the Workplace

FactSet prohibits all employees, contractors and visitors from possessing any weapons of any kind at the workplace, while engaged in activities for FactSet, and at Company-sponsored events. Weapons include: guns, knives, mace, explosives and any item with the standard potential to inflict harm. This list is illustrative only, and not exhaustive. FactSet prohibits employees from having weapons or ammunition shipped to the workplace.

IX. Legal Notice

This Code serves as a reference for you. FactSet may modify, suspend or revoke this Code and any or all policies, in whole or in part, with or without notice. The current version of this Code is posted on our public website and the Legal page on our intranet. It is your responsibility to review the Code from time to time to ensure you are in compliance. FactSet also reserves the right to interpret this Code and its policies in its sole but reasonable discretion as it deems appropriate.

Each FactSet employee is employed by the Company on an at-will basis, unless the employee has an executed employment agreement. At-will employment means that employment is not guaranteed for any specific amount of time and FactSet retains the right to terminate an individual's employment at any time with or without cause, subject to applicable law. No oral representations made by any FactSet employee with respect to continued employment can alter this relationship, including anything in this Code or other statements of policy. By establishing and communicating this Code and related policies, FactSet does not intend to create enforceable contractual rights for the benefit of any entity or person.

The provisions of this Code apply in France without prejudice to French law.

Last Modified: March 1, 2020