

GARTNER, INC.

REGULATION FAIR DISCLOSURE POLICY

Policy Statement

Gartner, Inc. (the “Company”) is committed to the full, fair, accurate, timely and understandable disclosure of information about the Company on a non-selective basis and in compliance with Regulation FD, as promulgated by the Securities and Exchange Commission (“SEC”), and other laws and regulations. For purposes of this policy, “public disclosure” means filing or furnishing a current report on Form 8-K with the SEC or disseminating information through another method of disclosure that is reasonably designed to provide broad, non-exclusionary distribution of the information to the public. The Company provides public disclosure through period and current SEC reports, press releases, presentations posted to its Website and webcasts.

Compliance and Materiality

It is the Company’s policy to comply with all periodic reporting and disclosure requirements, including Regulation FD. It has been, and continues to be, our practice to disclose material information about the Company in a public, timely and non-selective manner.

As a general rule, employees at the Company are not authorized to disclose material, non-public information about the Company. Any inadvertent disclosure of material, non-public information on a selective basis should be reported immediately to the General Counsel or to Investor Relations, who will determine any corrective action needed to be made in accordance with SEC rules and regulations, including Regulation FD.

Any information concerning the Company is considered material if there is a substantial likelihood that a reasonable investor would consider it important in determining whether to buy, sell or hold, or engage in other transactions concerning the Company’s securities. Information is considered non-public if it has not been the subject of public disclosure, as defined above.

Compliance Guidelines

The Company has established the following practices and procedures to ensure compliance with Regulation FD.

I. Authorized Representatives of the Company

- a. The Chief Executive Officer, the Chief Financial Officer and the GVP, Investor Relations shall have authority to communicate business or financial information concerning the Company on behalf of the Company to the following persons (who are referred to herein as “Securities Market Participants”):

- **securities market professionals, which includes brokers, dealers, analysts, investment advisors, institutional investment managers, mutual funds, hedge funds, and other investment companies;**
 - **shareholders of the Company who may reasonably be expected to purchase or sell the Company's securities based upon the communication; and**
 - **persons associated with any of the above-mentioned persons.**
- b. In addition, the Corporate Secretary and Assistant Corporate Secretary or their designees shall have authority to communicate with employee, shareholders and beneficial owners in response to inquiries regarding shareholder accounts and other administrative matters, including inquiries regarding their participation in the Company's plans.
- c. Any other communications by officers of the Company with Securities Market Participants must be pre-approved by Investor Relations and a member of the Investor Relations Department must participate in the communication; provided, however, that such officers do not have authority to communicate business, financial or other information about the Company that is material, non-public information.
- d. It is our policy that, except as specified under (a), (b) and (c), **no employee may communicate with Securities Market Professionals and should refer all inquiries from Securities Market Professionals to the Investor Relations Department.** Statements by employees or agents who are not authorized representatives of the Company should not be relied upon.

II. Quarterly Earning Releases and Quarterly Earnings Conference Calls

- a. The Company will hold quarterly conference calls that are broadly accessible to the public by dial-in conference call, by webcast, by broadcast, or by similar means. The Company's policy is to provide the public with advance notice of the date and time of each upcoming quarterly conference call. Within 48 hours prior to the quarterly conference call, the Company shall furnish its quarterly earnings release to the SEC on Form 8-K, and will post the earnings release on the Company's website at www.investor.gartner.com.
- b. Following each quarterly conference call, a playback of the conference call and a transcript of the prepared statements will be generally made available on the Company website at www.investor.gartner.com for a limited time period.

III. Financial Projections and Other Forward-Looking Statements

At the Company's sole discretion, it may publicly disclose guidance on estimates or projections relating to the Company's future earnings, performance, or operations. To the extent that the Company provides guidance relative to its financial goals, any such guidance, and changes to or affirmations of the guidance, will be done through methods designed to ensure broad disclosure. If and when provided, the guidance will constitute forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995 and will be subject to its "safe harbor" provisions. As such, any guidance is subject to risks and uncertainties that could cause actual results to differ materially from those as described in guidance provided by the Company. Information regarding certain risks and uncertainties is available in the Company's filings with the SEC, including the annual report on Form 10-K, quarterly reports on Form 10-Q, and current reports on Form 8-K, and may be provided in a press release.

Any guidance provided by the Company will be as of the date made and the Company undertakes no obligation to update the guidance. Any guidance will contain a legend to the foregoing effect. Additionally, the Company will not respond, except by means of appropriate public disclosure as provided herein, to any inquiries or rumors seeking reaffirmation of such information at any date subsequent to the date the information was originally provided.

IV. Analysts Models and Reports

If requested, the Investor Relations Department will review draft analyst reports and model input of actual results for accuracy of publicly disclosed facts only.

V. Presentations

- a. The Company will use safe harbor guidelines for forward-looking information as part of individual, group, and investor conference communications formats, including our Investor and Analyst Day presentation.
- b. The Company, in its discretion, may participate in securities firm-sponsored and other investor conferences only to the extent that adequate prior public notice has been given. The Company will issue media releases in conjunction with its major presentations scheduled during the year and/or post those presentations on the Company website, in the discretion of the Investor Relations Department. The Company does not intend to disclose any material, non-public information during these conferences.
- c. The Company, in its discretion, may participate in other forums at which Securities Market Participants could be present, including industry seminars, trade shows, and annual shareholder meetings. The Company does not intend to disclose any material, non-public information during these meetings.

VI. Media Communications

Although the Company recognizes that Regulation FD does not apply to communications with the media, it is the Company's policy not to disclose material information to the media unless it has been previously disclosed in accordance with Regulation FD. All media inquiries should be referred to Public Relations.

Further Information About Regulation FD

The Company will post this policy statement on its website at www.investor.gartner.com and update it as necessary to ensure that both Company associates and Securities Market Participants are informed about the Company's disclosure policy. Additionally, this policy will be circulated to all executive officers of the Company at least annually. All inquiries regarding the provisions or procedures associated with this policy should be directed to Investor Relations at:

Phone: +1 203 316 6537

Fax: +1 203 316 6525

E-mail: investor.relations@gartner.com