

# Morningstar, Inc.

## Anti-Slavery and Human Trafficking Statement

Effective Jan. 1, 2022

### About This Statement

This statement has been published in accordance with the UK Modern Slavery Act 2015 and Australia's Modern Slavery Act 2018. It will be supplemented annually with additional information regarding Morningstar's UK and Australian entities and detailing the steps taken during the year to prevent modern slavery and human trafficking in its business operations and supply chains.

### About Our Company

#### Our Business

Morningstar, Inc. is a leading provider of independent investment research in North America, Europe, Australia, and Asia. The company offers an extensive line of products and services for individual investors, financial advisors, asset managers and owners, retirement plan providers and sponsors, and institutional investors in the debt and private capital markets. Morningstar provides data and research insights on a wide range of investment offerings, including managed investment products, publicly listed companies, private capital markets, debt securities, and real-time global market data. Morningstar also offers investment management services through its investment advisory subsidiaries. The company has operations in 29 countries.

#### Our Company's Structure

Morningstar, Inc. is the parent company of all our global subsidiaries, and while not all of the entities are required to publish a statement, Morningstar is committed to ensuring all its entities operate in a consistent and effective way with regard to advancing human rights and combating slavery. In addition to the strong commitment of our board of directors and senior management to our human rights policies, we have a dedicated global chief compliance officer and global legal department responsible for overseeing implementation of our Human Rights Policy and other internal policies, frameworks, and standards within our business and supply chain.

### Our Policies on Slavery and Human Trafficking

Morningstar is committed to protecting human rights globally and to providing a fair and ethical workplace. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Human Rights Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

Our Human Rights Policy addresses how employees and other associated persons (agents, suppliers, and other service providers) are required to act to minimize the risk of slavery and human trafficking occurring in the business and in its supply chains. The Human Rights Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

### Expectations Regarding Our Employees

#### Hiring and New Employee Onboarding

Morningstar recognizes that a critical first step to eradicating modern slavery is to ensure that its own employees have been hired through a process that is free from coercion, illegal practices, or unethical behavior. As part of our hiring process, Morningstar confirms that each employee:

- Has not had to pay any direct or indirect fees to obtain work at the company; and
- Is legally able to work in the country in which that employee is employed.

In addition, new employees are provided with written information regarding the company's policies with respect to sick pay, holiday pay, and other benefits. New employees are required to read and acknowledge Morningstar's Code of Ethics, which mentions the Human Rights Policy and highlights its key components.

### **Training and Board Oversight**

Morningstar builds awareness of the problem of modern slavery through its annual process requiring all employees to read and acknowledge the Code of Ethics, which discusses the Human Rights Policy and other key internal policies, frameworks, and standards. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, a copy of the Human Rights Policy is available to all employees on our internal online platform and available to all our external stakeholders on our [governance website](#) and upon request. Modern slavery awareness training for key employees will be included as part of annual compliance training in relevant regions. Supplier relationship owners within Morningstar are guided in a process designed to ensure that declarations of compliance with the Modern Slavery Act are obtained from all relevant suppliers. Led by Morningstar's general counsel, the company's legal and compliance teams provide Morningstar's board of directors and nominating and corporate governance committees an overview of the company's compliance programs and corporate governance initiatives on a regular basis. Morningstar's audit committee receives reports on reported ethics concerns regularly.

### **Reporting and Compliance**

All employees at Morningstar are encouraged and empowered to ensure we are operating within the highest ethical standards. Our internal policies encourage any employee who suspects that a policy has been or may have been violated to immediately notify the global chief compliance officer. If an employee is in doubt about the appropriateness of any conduct, they are instructed to contact their Talent & Culture business partner or local legal or compliance representative to seek guidance before taking any action. Morningstar has established the confidential [Morningstar Ethics Hotline](#), which anyone can use to express concerns. The Morningstar Ethics Hotline is available 24 hours a day, seven days a week in each of the countries in which the company operates. Morningstar prohibits retaliation for reports or complaints regarding the misconduct of others. Morningstar expects all such reports or complaints to be made in good faith.

Morningstar takes very seriously, investigates, addresses, and responds to the concerns of its employees regarding ethics and human rights issues. Where we identify adverse human rights impacts resulting from or caused by our business activities, we are committed to taking appropriate corrective action.

### **Expectations Regarding Our Employees**

Morningstar is committed to acting with integrity in all our business relationships, and we expect the same of our suppliers and any other third parties acting on our behalf. Our [Supplier Code of Conduct](#) and third-party due diligence program are designed to ensure those suppliers know Morningstar's expectations concerning business ethics, integrity, human rights, management, and environmental practices. We strive to work with vendors whose policies and practices regarding human rights are consistent with our own.

Our supply chains include suppliers of IT, data and communications, office cleaning, property and other facilities management services, stock exchanges, legal counsel, insurers, healthcare providers, and recruitment agencies. Morningstar's Global Procurement Policy outlines our internal processes and responsibilities that are designed to ensure that our suppliers' conduct meets our standards with respect to treatment of information, avoiding conflicts of interest, compliance with law, and other appropriate conduct.

We require our suppliers to comply with applicable legislation where they operate as well as our Supplier Code of Conduct. Our Supplier Code of Conduct contains standards on human rights and labor rights, environmental sustainability, corporate sustainability, protection of personal data, and protection of property. We ask that our suppliers support Morningstar's goals around sustainability and diversity, equity, and inclusion, as it relates to our purchasing and supplier relationships with them. Morningstar expects its suppliers to uphold the human rights of their workers and treat them with dignity and respect.

## **Due Diligence Program**

Supplier evaluation and selection may include an assessment of suppliers' business practices and corporate values. Suppliers are expected to self-monitor their compliance with Morningstar's Supplier Code of Conduct when doing business with or on behalf of Morningstar. The company may periodically review a supplier's adherence to the Supplier Code of Conduct. Penalties for a supplier's failure to comply with the Supplier Code of Conduct will impact the supplier's standing with Morningstar and may lead to disqualification from future opportunities.

## **Further Steps**

On a continual basis, we take the following further steps to combat slavery and human trafficking:

- Screening new suppliers on their alignment or adherence to the UK Modern Slavery Act 2015, Australia's Modern Slavery Act 2018, and adherence to our Supplier Code of Conduct as applicable.
- Reviewing and monitoring compliance with our Human Rights Policy periodically.
- Obtaining employee acknowledgement of the Human Rights Policy annually as part of the Code of Ethics.
- Having senior management review our policies on a regular basis and sign off on any material amendments thereto.