

# Morningstar, Inc.

## Anti-Slavery and Human Trafficking Global Statement

As amended and in effect on June 1, 2024

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Morningstar, Inc. (“Morningstar” or the “Company”) is the parent company of many subsidiaries, and while not all of the subsidiaries are required by law to publish a statement, Morningstar is committed to ensuring it operates in a globally consistent and effective way with regard to advancing human rights and combating slavery. Accordingly, Morningstar adopted this Anti-Slavery and Human Trafficking Global Statement (“Global Statement”).

## 1. Scope and Applicability

Morningstar has adopted this Global Statement in accordance with the UK’s Modern Slavery Act 2015 and Australia’s Modern Slavery Act 2018 (collectively the “Modern Slavery Acts”). It is supplemented with additional information regarding Morningstar’s UK and Australian entities and the steps taken during the year to prevent modern slavery and human trafficking in its business operations and supply chains.

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 Global 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 Global 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 Global 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.

In addition to the strong commitment of the board of directors and Executive Leadership Team, Morningstar’s Global Compliance function (“Compliance”) has responsibility for overseeing implementation of the Human Rights Global Policy. This Global Statement should be read in conjunction with Morningstar’s Code of Ethics, Human Rights Global Policy, Supplier Code of Conduct, and other relevant global policies referenced herein. More information can be found on the [Corporate Governance page](#).

## 2. Hiring and New Employee Onboarding

Morningstar recognizes that a critical first step to eradicating modern slavery is to ensure that our 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:

- A. Has not had to pay any direct or indirect fees to obtain work at the Company; and
- B. Is legally able to work in the country in which they are employed.

In addition, new employees are provided with written information regarding Morningstar’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 Global Policy and highlights its key components.

### 3. Expectations of Vendors and Suppliers

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 information technology, 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 expect 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.

### 4. Due Diligence, Training and Oversight

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.

Morningstar takes steps to further combat slavery and human trafficking on a continual basis, some of which may include:

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

Morningstar builds awareness of the problem of modern slavery by requiring all employees to read and acknowledge the Code of Ethics, which references the Human Rights Global Policy and other key internal policies. Additionally, Morningstar provides all employees with annual training on the Code of Ethics and Global Compliance Policies, inclusive of the Human Rights Global Policy.

To facilitate a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, a copy of this Global Statement is available to all our external stakeholders on our Corporate Governance page and upon request. Supplier relationship owners within Morningstar are guided in a process designed to ensure that declarations of compliance with the Modern Slavery Acts, as applicable, are obtained from all relevant suppliers.

The Legal and Compliance teams provide Morningstar's board of directors and nominating and corporate governance committee an overview of the Company's compliance programs and corporate governance initiatives on a regular basis. Morningstar's audit committee receives information regarding reported ethics concerns regularly.

## 5. Reporting

Morningstar has implemented reporting channels to ensure the Company is operating within the highest ethical standards. Our internal policies generally require any employee who suspects that a Morningstar policy has been, or may have been, violated to immediately notify their local Compliance representative, who may then notify relevant stakeholders where needed. If an employee is in doubt about the appropriateness of any conduct, they are instructed to contact their local compliance representative to seek guidance before taking any action.

Morningstar has established the confidential Morningstar Ethics Hotline, which anyone can use to express concerns verbally or electronically. The Morningstar Ethics Hotline is available 24 hours a day, seven days a week in each of the countries in which the company operates. The information is available in the Morningstar Code of Ethics, the Morningstar website and intranet. 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.