

Morningstar, Inc.

Human Rights Global Policy

As amended and in effect on June 1, 2024

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Morningstar, Inc. (“Morningstar” or the “Company”) operates in a consistent and effective way with regard to advancing human rights. The purpose of this Human Rights Global Policy (“Global Policy”) is to establish Morningstar’s commitment to having standards and controls within our business and supply chain.

1. Scope and Applicability

Morningstar is committed to protecting human rights in all aspects of our business and to providing an equitable and ethical workplace. Our understanding of our responsibility to ensure that human rights are actively protected and observed encompasses our global operations and the activities of our employees, suppliers, and business partners. We support and promote the principles set forth in the following international standards and are signatory where applicable:

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- International Labour Organization Conventions and Recommendations
- UN Principles for Responsible Investment
- UN Global Compact

Additionally, we seek to measure and manage appropriately the impacts that our business may have on the communities in which we operate, including human rights impacts.

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 this Global Policy. This Global Policy should be read in conjunction with Morningstar’s Code of Ethics, Supplier Code of Conduct, Corporate Sustainability Report, and other relevant global policies found on the [Corporate Governance page](#), as applicable. Where local legislation is more stringent or conflicts with this Global Policy, specific Morningstar business unit and country policies in effect to adhere to those laws shall govern.

This Global Policy applies to conduct on Morningstar’s premises and in the course of Morningstar business, as well as off-premises conduct that affects any employee in the workplace or that creates a hostile, intimidating, or offensive working environment. Employees who engage in harassment in the workplace can expect disciplinary action, up to and including immediate termination.

2. Commitment to Human Rights and a Safe Workplace

Morningstar does not tolerate harassment or other abusive behavior by anyone, including employees, clients, vendors, suppliers, contractors, and consultants. Morningstar treats all full-time, part-time, and contract employees fairly and transparently, regardless of where they work, and complies with all local pay and labor law requirements, including any rights of our employees to join a trade union or other comparable organization and to otherwise exercise their rights to free association under applicable law. Morningstar seeks to pay employees competitively relative to the line of business and local labor market in which they work, and actively benchmarks the Company’s compliance with this commitment.

Morningstar is committed to maintaining a workplace free from sexual harassment. Sexual harassment is a form of workplace discrimination. All employees are required to work in a manner that prevents sexual harassment in the workplace. This Global Policy is one component of Morningstar's commitment to a discrimination-free work environment. Sexual harassment is against the law, and all employees have a legal right to a workplace free from sexual harassment. Employees are urged to report sexual harassment by filing a complaint internally with Morningstar. Employees can also file a complaint with a government agency or in court under applicable national or local anti-discrimination laws.

3. Commitment to Sound Labor Practices and Anti-Slavery

Forced labor (modern slavery) is a crime and a violation of fundamental human rights. For the purposes of this Global Policy, modern slavery encompasses slavery, servitude, forced and compulsory labor, human trafficking, and all activities that have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Morningstar has a zero-tolerance approach to modern slavery and child labor in our business operations and supply chain. For more information on the Company's stance against modern slavery and how we actively work against these systems of oppression, refer to the Anti-Slavery and Human Trafficking Statement.

4. Expectations of Vendors and Clients

Morningstar's commitment to human rights extends beyond our own businesses. The Company expects the same high standards from all contractors, suppliers, other business partners, and clients, and strives to work with vendors whose policies and practices regarding human rights are consistent with our own.

Morningstar expects our suppliers to comply with applicable legislation where they operate as well as Morningstar's Supplier Code of Conduct. Morningstar expects our suppliers to uphold the human rights of their workers and treat them with dignity and respect, and encourages all our suppliers to go beyond compliance to positively impact local communities, ecosystems, and the environment.

5. Due Diligence, Training and Oversight

Morningstar conducts and intends to continue to enhance due diligence processes designed to identify and prevent human rights risks to people in our business and value chain.

Morningstar builds awareness of human rights matters by requiring all employees to read and acknowledge the Code of Ethics, which references this 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 this Global Policy.

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 this Global Policy is available to all our external stakeholders on our governance website 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 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.

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. We also assess risk proactively before launching new products, services, or operations, entering a joint venture, or acquiring a company in order to ensure that ethical risks are a part of key strategic decision-making.

Additionally, we are signatories to, or members of, various international agreements and standards, including the U.N. Global Compact and U.N. Principles for Responsible Investment, which commit us to tracking and reporting on progress toward sustainability advancement in material areas. More details on Morningstar's sustainability initiatives and related policies can be found in our Corporate Sustainability Report.