

Title	Health, Safety and Environmental Policy
Effective Date	December 16, 2016
Update Date	December 21, 2018

Introduction

At S&P Global, we are committed to ensuring the health and safety of our employees, customers, clients, and other third parties. We strive to build more inclusive and sustainable communities through our people, products, and partnerships. We also strive to promote sustainability and minimize our environmental footprint by improving operational efficiencies.¹

Defined Terms

Certain terms are used in this Policy and defined as follows:

- **Health, Safety Environmental Advisor (HSEA):** This employee oversees the HSE program and reports to the SVP, Global Real Estate Services;
- **Site managers:** An employee responsible for managing and operating S&P Global local offices where the Company conducts business. The function resides in Global Real Estate Services.
- **Manager:** An employee responsible for overseeing one or more employees.
- **Vendor:** An external third-party that the Company has entered into a contractual relationship with to provide business goods, services, functions or activities.

Purpose and Scope

S&P Global (the Company) has adopted the S&P Global Health, Safety & Environmental Policy (Policy) to acknowledge and accept its statutory responsibilities for securing the Health, Safety, and Environment (HSE) of its employees and vendors working for the

¹ This Policy is based on International (ISO 14001, ISO 50001, & OHSAS 18001) requirements. In jurisdiction with more stringent requirements, the Company will adhere to those law and regulations.

Company. This Policy covers all employees of S&P Global and all of its subsidiaries. Company divisions may impose a more restrictive policy, in which case, the more restrictive policy would apply.

This Policy addresses S&P Global's approach to mitigating HSE risks and exposures and reflects the importance of protecting the HSE of all who may be affected by the Company's business activities

Policy Statement

S&P Global's Human Resources, Global Real Estate Services, and Global Security and Crisis Management Departments (the HSE Function) will create and maintain safe and healthy working conditions and to protect the environment where we operate. In order to accomplish these goals, S&P Global will:

- Conduct its operations in **compliance** with legislation, published approved codes of practice, and other applicable standards concerning HSE;
- Look to **protect the environment**, by the **prevention of pollution** of our activities on the environment;
- Provide **HSE objectives** including a carbon action plan, which will be regularly reviewed;
- *We **monitor our performance** against various systems , including inspections, audits and data gathering*
- *Management team regularly **review** all relevant environmental data to push improvement forward*
- **Continually** improve the HSE function to prevent injury and illness based on the results of periodic reviews taking into account regulatory developments, customer needs and community expectations;
- **Participation** of workforce into improving the HSE management system and its processes, by holding regular forums with the senior admin team
- Ensure that responsibilities for HSE are properly assigned, accepted and fulfilled at all levels;
- Provide adequate resources to implement HSE initiatives;
- Ensure that risks arising from work activities are assessed, effective control measures are implemented and suitable policies and procedures are provided, implemented and regularly reviewed;
- Provide managers and employees with information, training, and supervision regarding HSE matters;
- Notify employees regarding HSE issues and changes to new or existing work practices;
- Provide an appropriate level of information and instruction regarding HSE to its visitors and contractors;

- Communicate the Policy to employees via notice boards and Intranet (Global HSEQ page);
- Produce the Policy to interested parties upon request;
- Commitment to participation of workforce into improving the management system and its processes, which will done via the senior admins meeting and via the blog on the Intranet
- Regularly review the Policy to ensure it remains appropriate to the nature and scale of S&P Global HSE risks;
- Provide and maintain safe equipment and facilities;
- Monitor work related accidents, illnesses and safety performance.

S&P Global Real Estate Services will perform a regular review of this Policy to ensure that the highest standards of HSE are maintained and that the Policy remains relevant and appropriate. This Policy will also be reviewed annually, or when there is significant change to the business or relevant legislation. Any significant changes will be communicated to employees.

Responsibilities

1. Global Facilities Director

The Global Facilities Director is responsible for the management of facilities and the provision of adequate resources to ensure standards are fully implemented within the Company according to agreed objectives.

2. Global Health, Safety and Environment Advisor (HSEA)

The role of the Health, Safety and Environment Advisor is located in Global Real Estate Services and ultimately reports to the SVP, Global Real Estate Services and includes:

- Formulating an effective HSE Policy to include an effective risk assessment process;
- Coordination of the production of risk assessments and HSE policies & procedures throughout the Divisions;
- Working with the Divisions, managers, employees, contractors, enforcement agencies, consultants, and advisors to secure best practice HSE processes throughout the Company;
- Ensuring the effective operation of the Health & Safety accident reporting procedures;
- Carrying out audits of premises and provides reports detailing any necessary recommendations;
- Periodically reviewing the Company's HSE policies & procedures and training programs for effectiveness;
- Coordinating the gathering of accident/incident statistics, to identify trends and make recommendations for reduction in accidents and loss through incidents;
- Assisting with the development and implementation of the HSE training program;
- Attending HSE related meetings providing advice as required and implementing agreed actions;
- Providing advice to employees at all levels to enable them to fulfil HSE responsibilities relevant to their businesses.

3. Site Managers

Site Managers Responsibilities include:

- To read and understand relevant HSE policies and procedures and related risk assessments relevant to the work activities;
- Review work locations to ensure that the appropriate measures have been implemented to cover all the significant risks arising from the work activities within their control, and that control measures identified have been implemented;
- Report HSE hazards or risks that are beyond their levels of control to their Manager and the HSEA;
- Assist the HSEA in identifying areas requiring safety procedures and make suggestions for improving HSE standards within their areas of responsibility;
- As far as possible, ensure employees under their control receive HSE information, instruction and training commensurate with their job role and responsibilities;
- Take appropriate action in accordance with the Company policies when employees or contractors under their control are observed working in an unsafe manner or breaching S&P Global's HSE policies & procedures; ensure all employees under their control report all accidents/incidents;
- In the event of an accident take immediate action to make the area safe and prevent a recurrence; ensure that all accidents and incidents occurring in relation to operations within their control are reported and effectively investigated and where necessary suitable risk controls identified and implemented to prevent a recurrence.

4. Employees

All employees have a responsibility for their own safety and that of other persons who may be affected by their acts or omissions and to cooperate with the implementation of the Health, Safety and Environment policy and the integration of safety into all Company activities. This includes reporting any work situation which may lead to serious or immediate danger to individuals. Managers have an additional responsibility to ensure their employees are aware of this policy.

Employees are expected to read and understand S&P Global's HSE policies and procedures and related risk assessments relevant to his/ her work. In particular the employee must:

- Carry out their duties in a safe manner, in accordance with Company policies, procedures and safe working practice;
- Be alert to hazards while carrying out work for the Company and to make suggestions for safer work procedures as appropriate;
- Take reasonable care of their own health and safety and that of others who may be affected by their actions;
- Ensure accidents/incidents are reported to their manager immediately;
- Report suspicious packages or any defects in equipment to their immediate manager;
- Adhere to the site rules governing restricted access areas;
- Use Personal Protective Equipment (PPE) correctly and report any defects in PPE promptly. PPE may include goggles, helmets, or other protective clothing;
- Report any matter likely to compromise fire safety in the building, and to cooperate with Fire Marshals during emergency or drill situations;
- Maintain a safe work environment to reduce the risk of accidents;
- Only operate work equipment for which they have been specifically trained and in the correct manner;
- Use hazardous substances in accordance with documented Control of Substances Hazardous to Health (COSHH) Assessments and specific training;
- Use Display Screen Equipment in accordance with specific training.

5. Vendors

All vendors must comply with the Vendor Code of Conduct and all applicable laws and regulations in accordance with the Vendor Governance Policy. For additional guidance, see the Vendor Governance Policy.

S&P Global HSE Committee (where applicable)

S&P Global will establish an HSE Committee where required to comply with relevant legislation. Membership in trade unions will be recognized as required by law. The HSE Committee would consider the following issues, not limited to:

- This Committee will be comprised of members from Global Real Estate Services, Human Resources, and Global Security.
- Establishing additional standards and procedures to ensure successful implementation of HSE requirements;
- Review and communicate HSE performance across Divisions and locations;
- Oversee the implementation of risk assessments and the introduction of policies and procedures throughout S&P Global;
- Assess and implement HSE training as needed;
- Periodically review local legislative requirements to ensure compliance with new standards and procedures.

6. Environmental Governance

Our Environmental Action Committee (EAC) is comprised of senior management responsible for the Company's climate change and emission reduction efforts, and establishing and monitoring the Company's Environmental Sustainability Strategy. The EAC meets approximately quarterly, or as needed. The EAC reviews the Company's environmental impacts and establishes performance targets aimed at cost efficiencies and enhanced risk and reputation management.

The Committee convenes regularly and helps to coordinate and manage assessment of the risks associated with climate change and tracking of the Company's performance data.

7. Climate Risk

At S&P Global we are committed to reducing our impact on climate change and increasing our contribution to understanding sustainability issues, including climate change, through our information products.

Some measures we are taking to reduce our impact include:

- Benchmarking the existing energy performance of all S&P Global buildings (owned and leased) and continuing ongoing measurement of building performance to identify poor energy performers to target for improvement and reward higher performers through Energy Star (or LEED certification).
- Striving to meet our environmental performance targets to reduce the environmental impact of our operations over time.
- Continuing to engage employees through programs such as the Green Teams to reduce the Company's environmental footprint.

- Shaping the sustainability agenda through our product offerings.
- Continuing our partnerships with industry groups, policymakers and organizations to advocate for positive change, and provide relevant information to assist in their leadership and policy efforts on climate change.

Failure to Comply

Failure to comply with this Policy may lead to disciplinary action up to and including termination of employment.

Related Reference Documents

Additional guidance is available in the following related documents:

- [Code of Business Ethics](#)
- Global Financial Crimes Compliance Policy
- [Vendor Governance Policy](#)

Contact Names for Further Information

Inquiries regarding this policy may be directed to S&P Global Chief Corporate Policy Officer or SVP Global Real Estate Services.