

IHS Inc.

Business Code of Conduct



Letter from the CEO

The IHS Core Values – Integrity, Respect, Accountability, Teamwork and Innovation – reflect our commitment to operate at the highest ethical standards. Our Values, along with our IHS Business Code of Conduct, help us ensure that we operate ethically, act within applicable laws and continue to behave as a responsible corporate citizen in the communities we serve.

Our Code of Conduct provides guiding principles on how to appropriately conduct business. All colleagues should review the Code and continue to refer to it when doing business on behalf of IHS.

I encourage you to discuss any questions or concerns you may have about the Code or a particular activity at IHS with your leader or other IHS representatives listed in this document. If you prefer, you may also make a report to our Code of Conduct Hotline either by telephone or online at www.ihsHotline.ethicspoint.com. Our leadership team is committed to fostering an environment that supports open communication and trust. IHS will treat reports of suspected violations confidentially. No one reporting a suspected violation in good faith will be subject to retaliation for making such a report.

Thank you for your continued dedication to IHS and for your commitment to upholding the standards in our Code.



Scott Key
President and Chief Executive Officer



Our Values

Teamwork

We promote and support a diverse yet unified team. We work together to meet common goals while striving to achieve excellence in all we do, creating company, team and individual professional success.

Respect

We honor the rights and beliefs of our fellow colleagues, our customers, our shareowners, our partners and our community. We treat everyone with the highest degree of dignity, equality and trust.

Accountability

We identify and accept our individual and team responsibilities. We make clear our commitments and meet them. We take responsibility for our performance in all of our decisions and actions.

Integrity

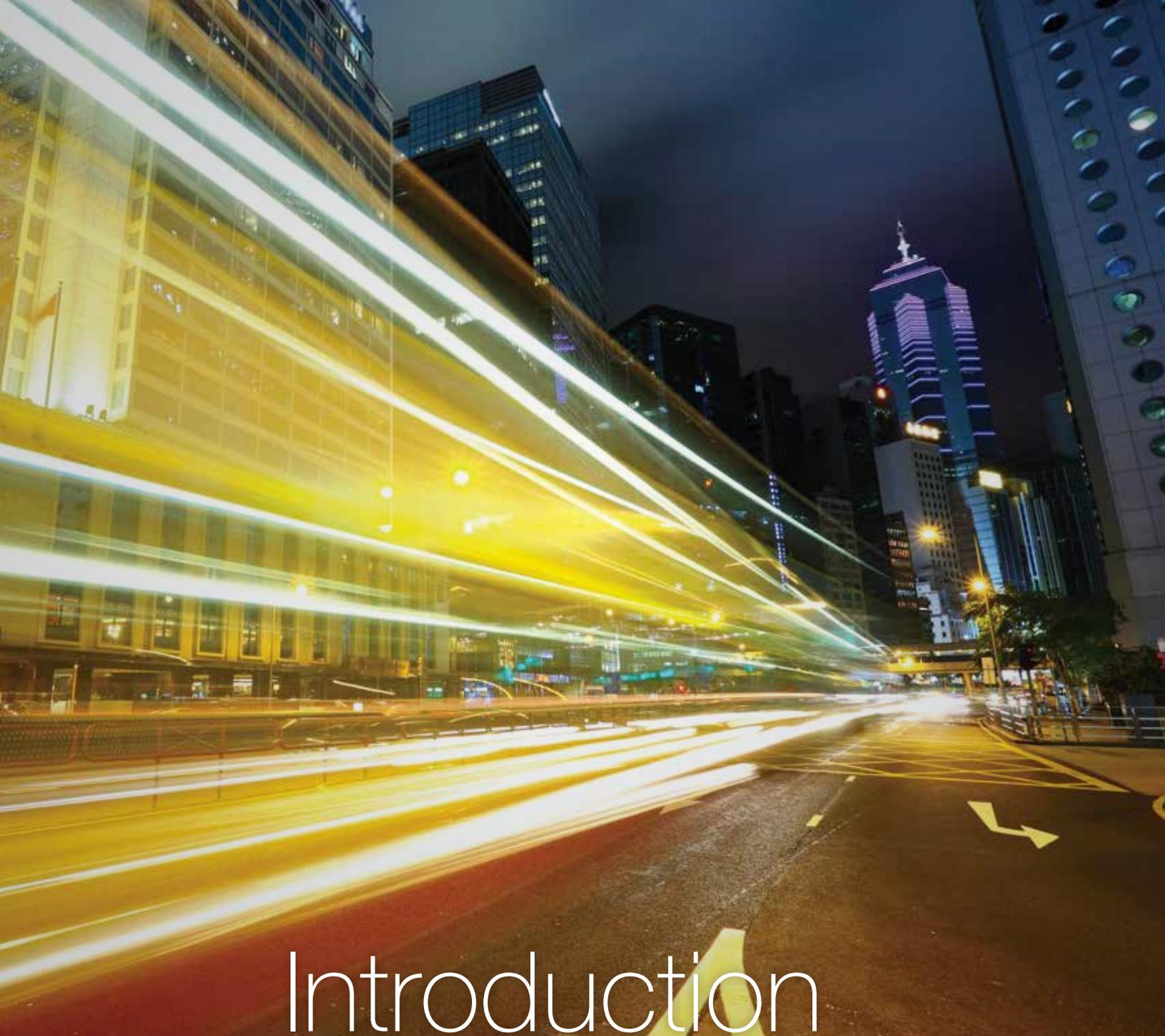
We employ the highest ethical standards, demonstrating honesty and fairness in every action that we take - recognizing there is no right way to do a wrong thing.

Innovation

We look for opportunities to leverage our skills, technology and each other to deliver new value in new ways. We are creative and entrepreneurial in bringing value to our customers, colleagues, shareholders, partners and community. We anticipate change and welcome the opportunities that arise as a result.

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Introduction

We are IHS. As such, each of us makes a valuable contribution to maintaining our Company's reputation as the leader in insight and information. We further this goal by upholding IHS values as we interact with our Company's stakeholders. This requires that we act with integrity and accountability towards our fellow colleagues, customers, suppliers, other business partners, governments and communities.

Our Code is the cornerstone of our commitment to acting ethically and in compliance with the law. It serves as a guide for ethical decision-making, providing information regarding the most common ethical and legal dilemmas we may face when conducting work on behalf of IHS. Although our Code is comprehensive, it does not cover every situation that may arise. Therefore, it may be necessary to reference individual policies, procedures or guidelines in order to obtain more detailed information.

Our Shared Commitment

Our Code applies to all colleagues, officers and directors, in all locations where IHS does business. We are all expected to read and follow the Code, as well as all Company policies, procedures and guidelines that govern our work. Many of these documents are available on the IHS intranet, TheSource, or are on file with your regional Human Resources representative. In addition, individual business units may issue policies that govern certain business practices. If you need help finding or understanding a policy, please speak with your manager, our Corporate Compliance Department or anyone else listed in the section titled “Where to Seek Help and Report Concerns.”

We must also follow all laws and regulations that apply to our work. At times, this may include laws in place in more than one country and the laws in place in a country other than where you are employed. In the event you find yourself in a situation where local laws or customary conduct conflicts with our Code or other Company policies, you must follow the most conservative standard.

If you know about or suspect a violation of our Code, Company policy, law or regulation, you owe it to your colleagues and to our Company to make your concerns known. Doing so is necessary to uphold IHS values. You are encouraged to report any issue to your manager or anyone listed in “Where to Seek Help and Report Concerns.”

We also expect our suppliers and other business partners to do business according to the law and the ethical standards included in our Code. If you know or suspect that a supplier or other business partner is violating the law or our ethical standards, you are encouraged to report the situation to your manager or anyone listed in “Where to Seek Help and Report Concerns” immediately.

Our Managers’ Responsibilities

IHS managers are expected to serve as ethical role models for all colleagues by exemplifying our Company’s values at all times. These leaders must communicate the importance of the Code and strive to create a positive work environment in which colleagues feel comfortable asking for help and raising concerns relating to the Code or other Company policies. Managers must also be alert to any situations or actions that may violate the letter or spirit of the Code or other Company policies, or may damage our Company’s reputation. It is important that these leaders take immediate action to address such situations. When a manager receives a report of a situation that involves potential ethical or legal misconduct, he or she must promptly notify our Corporate Compliance Department, his or her regional Human Resources representative or anyone else listed in “Where to Seek Help and Report Concerns” in order to make sure the report is addressed.

Managers who know about, or should know about, misconduct and do not act promptly to report it will be subject to disciplinary action. Under no circumstances may managers commit an illegal act or instruct or enable others to do so. In addition, managers may never engage in or tolerate retaliatory acts made against anyone who in good faith reports misconduct; instead, managers are expected to clearly communicate to their teams our Company’s “no retaliation” policy.





REPORT CONCERNS

Where to Seek Help and Report Concerns

At times, you may encounter a situation where you are unsure of the right course of action. If you face such a situation, ask yourself the following questions:

- Is the action ethical?
- Does the action comply with our Code, other Company policies and the law?
- How could the action affect others, including our customers, shareholders, colleagues and the community?
- How would I feel if the action was made public?

If your answers to these questions do not clarify whether or not you should take the action, seek guidance before proceeding. Remember, even if an action is technically legal but appears unethical, you should consider taking an alternate course.

If you need help or would like to voice a concern, your manager is likely the best person to speak to because he or she knows your department and your work situation. However, you are also encouraged to contact any of the following resources when seeking assistance:

- A regional Human Resources representative
- An attorney working in the Legal Department
- The head of Internal Audit
- IHS Chief Compliance Officer
- The global head of Human Resources
- IHS General Counsel
- IHS CEO
- Our Business Code of Conduct Hotline

Our Business Code of Conduct Hotline is a third-party telephone and internet-based service that is available 24 hours per day, seven days per week. When local law allows, calls to the Business Code of Conduct Hotline may be placed anonymously. Please see our Business Code of Conduct Hotline Policy or our Hotline provider's website at www.ihs hotline.ethicspoint.com for additional information about submitting a report.

Handling of Reports

All reports will be investigated promptly and appropriate action will be taken. These reports will be kept confidential to the fullest extent allowed by local law and consistent with the resolution of the issue. If the reported conduct is determined to be a violation of our Code, Company policy or the law, the individuals involved will be subject to disciplinary action, up to and including termination of employment. In addition, misconduct may be reported to the proper authorities, which may lead to civil and/or criminal prosecution.

When required by local law, individuals named in a report will be provided an opportunity to access the information reported and make corrections, in the event the information reported is incorrect.

Non-Retaliation

Our Company does not permit acts of retaliation against those who make a report in good faith. Making a report in good faith means that you provide all of the information you have regarding the issue and believe the report to be true. In addition, you will not face retaliation for participating in an investigation of a report.





Co-Workers

Acting With Integrity Towards Each Other

Inclusion and Diversity

At IHS, our first corporate value is teamwork. In order to work as a team, we must value one another and work together in order to further our professional excellence. This means we must treat everyone in the workplace with respect by valuing differing ideas, opinions and experiences. While each of us has a right to our own personal beliefs and values, we must avoid imposing them on others when conducting work on behalf of IHS.

Discrimination and Harassment

In order to maintain an inclusive and diverse workplace, we must each take steps to ensure it is free from acts of discrimination. IHS is committed to making all employment decisions based on job-related qualifications and without regard to legally protected characteristics, which typically include age, sex, race, disability, religion, sexuality or other personal characteristics.

In addition, we must also make sure that our workplace is free from harassment. “Harassment” is offensive behavior that interferes with another’s work environment or creates an intimidating or hostile workplace. Harassment can take many forms and may or may not be sexual in nature. Potentially harassing behavior includes unwelcome sexual advances or remarks, slurs, off-color jokes or disparaging comments about another’s race, religion or ethnicity. This is true regardless of whether harassment is actionable under local law in the country where you are working.

Acts of discrimination or harassment will not be tolerated. If you believe that you or someone else may have experienced discrimination or harassment, you should report the situation to your manager, regional Human Resources representative, or anyone else listed in “Where to Seek Help and Report Concerns.” For additional information, see our discrimination and harassment policies on TheSource. You will not experience retaliation for making a good faith report.

Workplace Health and Safety

IHS strives to provide each of us with a safe and healthy work environment. It is necessary for us to work together in order to achieve this goal. This means we must always follow all workplace health and safety rules and procedures, as well as any applicable laws and regulations. This includes our policies and procedures relating to the maintenance of a violence- and substance-free workplace. By keeping workplace health and safety at the forefront of our minds, we avoid risk to ourselves and to those around us. If you are aware of an unsafe working condition that poses a danger to yourself or others, you are asked to report it immediately to your manager or anyone else listed in “Where to Seek Help and Report Concerns.” If the situation poses an immediate threat to yourself or others, report the issue immediately to your local law enforcement agency, your on-site security personnel, your manager and our Human Resources Department.

Employee Information

During the course of our employment, we have entrusted IHS with our personal information. We each have a duty to protect this information by following all applicable data privacy laws and procedures that are in place in the locations where we do business. This means we may not access another colleague’s personal information without specific authorization and a legitimate business-related need. In addition, we may not share this information with anyone, either inside or outside our Company, who does not have a business need to know it. At all times, we must properly protect all such data in our possession. Many countries have their own legal requirements governing the use of personal information. See our Personal Information Privacy Policy for more information. If you have additional questions or concerns, contact our Corporate Compliance Department or anyone else listed in “Where to Seek Help and Report Concerns.”



SHAREHOLDERS

Acting with Integrity Towards Our Shareholders

Conflicts of Interest

Each of us has an obligation to act in IHS best interest. A “conflict of interest” arises when our personal interests interfere with those of our Company. Each of us must therefore work to avoid situations that present an actual or apparent conflict of interest.

Although it would not be possible to describe every situation in which a conflict of interest may arise, some more common examples follow. Please remember that these guidelines also apply to members of your “immediate family,” which includes a spouse, significant other, parent, grandparent, child, grandchild, sibling, aunt, uncle, niece, nephew, cousin, in-law, step-relative or any other family member living with a colleague. Also note that you have a duty to our Company to disclose any actual or potential conflict of interest situation to your manager and our Corporate Compliance Department immediately upon discovery.

Gifts, Meals and Entertainment

One of the most common areas where conflicts of interest arise is when we offer or receive gifts, meals or entertainment. In general, modesty should be our guide in these situations. This means we may offer or accept non-cash gifts of nominal value when doing so:

- Promotes a successful working relationship and overall goodwill;
- Conforms to the reasonable and ethical practices of the country location;
- Does not create an actual conflict of interest or divided loyalty; and
- Does not create the appearance of an improper attempt to influence business decisions.

We may also offer or accept customary business meals and entertainment, provided the meal or entertainment:

- Is reasonable in value;
- Is not prohibited by the offeror’s or recipient’s business practices; and
- Does not influence or give the appearance of an improper attempt to influence business decisions.

The guidance provided above is typically acceptable in commercial business environments. However, it may be against the law to offer gifts, business meals or entertainment to government employees. As a result, we may not make any such offer to a government employee without first receiving approval from our Legal Department.

In any other situation, if you are unsure whether you may offer or accept a gift, business meal or entertainment, please contact your manager, our Corporate Compliance Department or anyone else listed in “Where to Seek Help and Report Concerns.”

Outside Positions

Conflicts of interest also commonly arise when we accept outside employment. Under no circumstance may we take an outside position with a company that is an IHS customer, supplier or competitor. In addition, we may not accept outside employment or engage in any outside business activities if doing so could compete with IHS business or interfere with our ability to perform our work for IHS.

Please note that an actual or apparent conflict of interest may arise when we are involved in a business transaction where the company we are negotiating with or directing business to employs an individual with whom we have a personal relationship. In this case, you must work with your manager and our Corporate Compliance Department to address the situation.

Advantageous Opportunities

We may not accept or pursue business or personal opportunities that arise by way of our position at IHS or through the use of IHS property or information.

This includes:

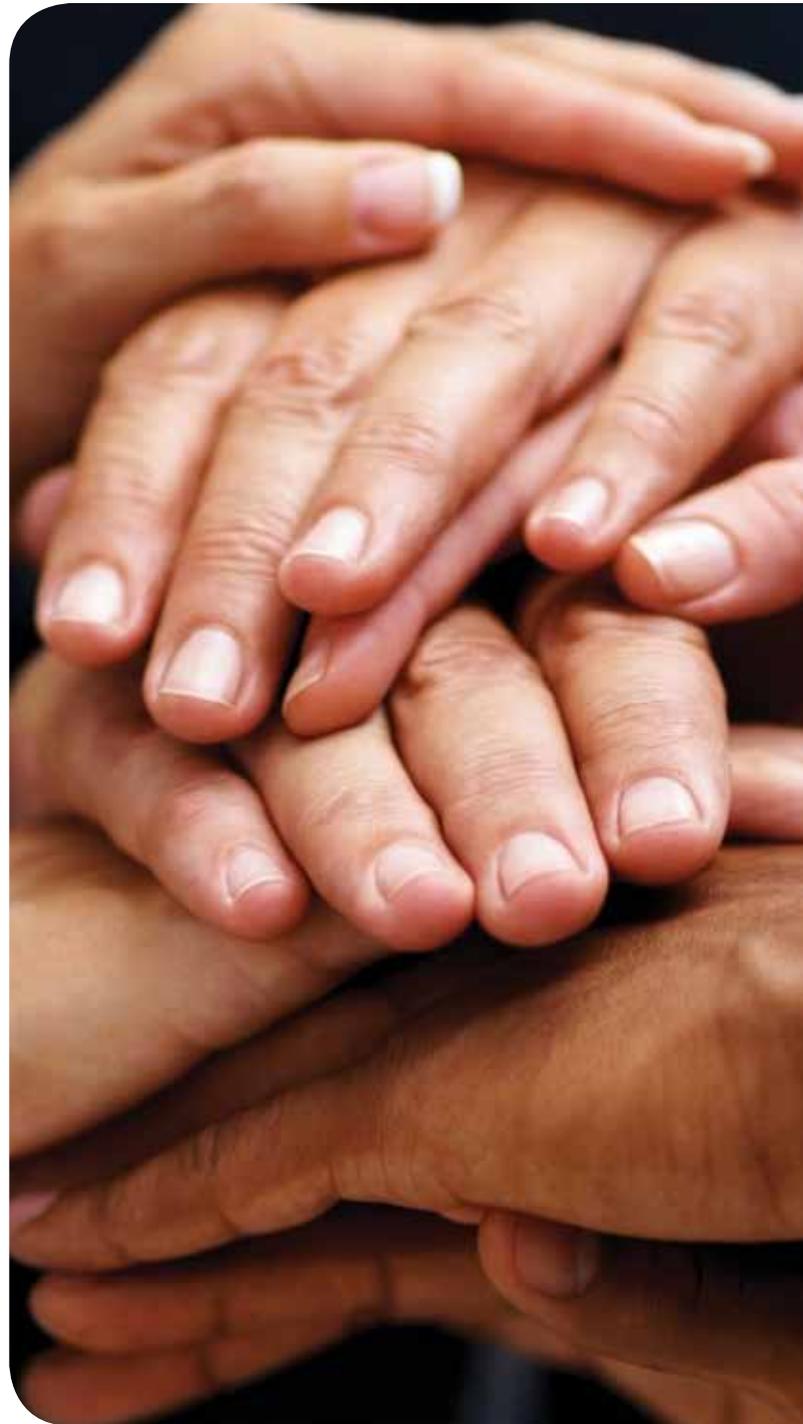
- Business or investment opportunities, unless and until our Company has had an opportunity to evaluate them and has chosen not to pursue them.
- Opportunities to purchase for personal use goods or services offered by our Company's suppliers on terms other than those available to the general public or established by Company policy.

In addition, we may not have a personal interest in a transaction involving IHS, or an IHS customer or supplier. Finally, at no time may we compete in any line of business of IHS, regardless of the manner in which the opportunity to do so arises.

Employment of Relatives

In order to avoid a conflict of interest, including the appearance of favoritism, we may not work directly for, work in the same chain of command as, supervise or make employment decisions about an immediate family member. In addition, we may not hold a position where we have access to confidential information regarding an immediate family member, such as payroll records or personnel information.

Conflict of interest situations may not always be obvious or easy to resolve. You should report situations that involve actual or potential conflicts of interest to your manager, our Corporate Compliance Department or anyone else listed in "Where to Seek Help and Report Concerns." For additional information, see our Conflicts of Interest Policy.



Company Assets

By working for IHS, we have made a commitment to each other, our Company and our shareholders to use our Company's assets appropriately. We are each responsible for taking care when using IHS property, making sure our use promotes a legitimate business purpose. At all times, we are obligated to protect IHS property from theft, damage, loss and misuse. Any actual or suspected theft, damage, loss or misuse should be immediately reported to anyone listed in "Where to Seek Help and Report Concerns."

Information Technology Systems

We must always use IHS information technology systems for responsible and authorized business purposes, meaning we may never use them to access, create, store or transmit material that is defamatory, libelous, sexual, racial, offensive, indecent, obscene, harassing or to inappropriately disclose another's personal information. In addition, only IHS-approved software may be downloaded onto an IHS computer.

Since the information technology systems we use when working for IHS belong to our Company, we should not expect that emails, Internet activity or voicemails transmitted or received on IHS network systems are private. Our Company may monitor electronic communications or information created and/or stored on a Company asset, and may also review content for specific purposes, unless this activity is prohibited by local law. See our Acceptable Use of Technology Policy for additional information regarding the proper use of IHS' information technology systems.

Information

Confidential and Proprietary Information

IHS confidential and proprietary information is one of our Company's most valuable assets. Protecting this information plays a vital role in our continued growth and ability to compete. The definition of "confidential and proprietary information" includes all non-public information that might be useful to competitors or that could be harmful to our Company, its customers, or its suppliers if disclosed. Some common examples are as follows:

- Trade secrets
- Business research
- New product plans, objectives and strategies, records and databases
- Personnel information, such as salary and benefits data and medical information
- Customer, colleague and supplier lists
- Unpublished financial or pricing information

All IHS confidential and proprietary information must be held in strict confidence, except when disclosure is authorized by our Company or required by law. This means that we may never reveal this information to outside parties or to fellow colleagues that do not have a business need to know it. When it is necessary to disclose IHS confidential or proprietary information to third parties for proper business purposes, a confidentiality agreement in a form approved by our Legal Department must be signed before the information is disclosed.

Intellectual Property

We are also obligated to safeguard our Company's proprietary intellectual property, even if public, which includes our trademarks, patents, copyrights and inventions. Please note that IHS owns the copyright in works and the patent rights in innovations that we develop during the course of our employment. Our obligation to protect this information continues even after our employment ends. At that time, we must return all confidential and proprietary information in our possession. For additional information about protecting intellectual property, see our Intellectual Property Policy and our Employee Confidentiality and Innovations Agreement.

Third-Party Information

Just as we must act to protect the confidential and proprietary information that belongs to IHS, we must also protect any such property belonging to others. Each of us must take care to avoid infringement of non-IHS intellectual property by avoiding any unauthorized use of a protected invention, identifier (such as a name or logo) or work (such as a photograph, printed materials or software). You may never knowingly make use of that information without obtaining prior permission from its owner. If you have any questions, contact our Legal Department or anyone else listed in "Where to Seek Help and Report Concerns."

Reputation

In order to ensure that our communications with the media, investors and investment analysts is complete, comprehensive and accurate, only designated Company spokespersons may make statements to these groups on our Company's behalf. If a media representative, investor, or analyst contacts you about an IHS matter, do not comment. Instead, refer the caller to our Investor Relations Department or an authorized spokesperson. For additional information, please see our Disclosure Policy.

Accurate Records

We must each do our part to make certain that the financial documents our Company discloses to the public are full, fair, accurate, timely and understandable. We can assist in this process by making sure that the data or information that we submit in Company records—including personnel, time and expense records—is accurate and complete. Those of us whose job duties involve recording this data must make sure we do so in compliance with our Company's system of internal controls and all applicable accounting requirements.

In addition, we may only engage in legitimate and authorized business transactions. To do so, we must make sure we:

- Make accurate representations on behalf of our Company, whether verbally or in writing
- Characterize Company transactions appropriately
- Never hide Company funds or create undisclosed or unrecorded fund accounts

If you have accounting, recordkeeping or auditing concerns, you are encouraged to contact our Chief Accounting Officer or anyone listed in "Where to Seek Help and Report Concerns." Please keep in mind that you will be protected from retaliation as a result of making a good faith report. For additional information, please see our Disclosure Policy.

Records Retention

Properly maintaining and destroying records is an important aspect of keeping accurate business records. We must retain all IHS records in conformity with the guidelines set forth by our Company, as well as local laws. These guidelines and laws dictate the length of time to keep business records, as well as the way in which they are to be destroyed.

If you are notified by our Legal Department that the records you possess are relevant to an anticipated or pending litigation, investigation or audit, follow the guidelines set forth in that notification. Do not destroy documents in anticipation of such a notification, and do not alter, conceal or destroy any covered document unless our Legal Department instructs that you may do so. Further, if you receive a subpoena or request for information from a third party, submit the document to our Legal Department immediately, before taking or promising any action.

Investigations and Audits

During the course of our employment, we may be asked to participate in an investigation or provide information in connection with an audit. We owe a duty to our Company to fully cooperate with any such request. We must provide only complete and truthful answers and never attempt to mislead or improperly influence an auditor or investigator.

Insider Trading

While working on behalf of IHS, we may become aware of material non-public information about our Company or other companies. Material non-public information (also known as “inside information”) is information about a company that is not known to the general public which could influence a typical investor’s decision to buy, sell or hold that company’s securities. In general, we should always assume that the non-public information we have knowledge about through our employment is material. This information should be considered non-public until it has been effectively disclosed to the public and a reasonable waiting period has passed in order to allow it to be absorbed by the marketplace.

Additionally, we may never share inside information with anyone outside our Company or use this information for our own benefit. Even within the Company, we must not share inside information with anyone who does not have a need to know it. In particular, we may not use inside information to trade in securities, or provide a related “tip” to a family member, friend or any other person. This action is contrary to IHS policy and may also be a violation of securities laws.

For more information about insider trading, please see our Insider Trading Policy. Prior to engaging in any securities transaction, make sure to consult all related policies issued by IHS and, if necessary, contact our Legal Department with any questions you may have.



CUSTOMERS

Acting with Integrity Towards Our Customers

Fair Dealing

IHS has become an industry leader based upon the quality of the services we provide. Although we compete vigorously to maintain our market position, we must do so fairly, being careful to communicate with candor and to never misrepresent the quality, features or availability of our products or services. In part, this means maintaining high standards of fairness and honesty when engaging in marketing, promotion and advertising activities. At no time may we engage in acts of manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other similar practices. We also may not make untrue statements about our competitors' products or services.

For some of us, our job duties might involve collecting information about a competitor. We must always exercise caution when engaging in this activity, making sure that we act in a lawful and ethical manner. If you have any questions regarding the relevant permissible guidelines, contact your manager, our Corporate Compliance Department or our Legal Department for assistance.

Competition

In order to compete fairly, we must also follow the antitrust and competition laws in place in the countries where we do business. These laws are designed to preserve a level playing field for businesses by prohibiting certain formal and informal agreements and practices that restrain trade. To comply with these laws, we may not engage in discussions with competitors that may restrain trade, such as price fixing, bid rigging, or dividing or allocating markets, territories or clients.

Antitrust and competition laws also prohibit entering into certain formal or informal agreements with suppliers, distributors or customers that may restrict competition. These agreements often involve tying products, fixing resale prices or refusing to sell to particular clients or buy from particular suppliers. Exercise caution when discussing any of these topics, especially when

attending industry association meetings. If a discussion ensues regarding a prohibited topic, stop the conversation immediately and report it to our Corporate Compliance Department, our Legal Department or anyone else listed in "Where to Seek Help and Report Concerns."

Antitrust and competition laws can be complex and violations may subject our Company and its colleagues to criminal sanctions, including fines, jail time and civil liability. For additional information regarding this topic, please see our Antitrust Compliance Policy. If you have concerns regarding antitrust and competition laws, contact our Corporate Compliance Department, our Legal Department or anyone else listed in "Where to Seek Help and Report Concerns."





GLOBAL COMMUNITY

Acting With Integrity Towards Our Global Community

Anti-Corruption

The many communities in which we conduct business rely on us to act according to the highest ethical standards. These standards require that we never engage in or otherwise promote bribery or corruption. This means that we may never make, promise, offer or authorize the making of a bribe, kickback or other improper payment in connection with our Company's business if the purpose or intent is to improperly retain or obtain business or any other favorable action. A "bribe" could include anything of value, including cash payments, charitable donations, loans, travel expenses, gifts and entertainment. A "kickback" is the return of a sum of money already paid or due to be paid as a reward for making or fostering business arrangements. Keep in mind that we cannot engage a third party to engage in this activity on our behalf.

Anti-corruption laws are complex, and the consequences for violating these laws are severe. You are encouraged to discuss any concerns you have regarding bribery or corruption with our Corporate Compliance Department, our Legal Department, or anyone else listed in "Where to Seek Help and Report Concerns." For additional information regarding anti-corruption, please see our Anti-corruption Policy.

Global Trade Controls

Governments around the world regulate overseas trade through restrictions on exports and imports of goods, technology and services. If your work involves international trade activities or if you deal with foreign citizens, it is your responsibility to know and comply with all relevant laws and regulations.

An "export" occurs when a product, service, technology or piece of information crosses a country's border or in certain circumstances is transferred between citizens of different countries, even if the transfer occurs within a single country. Import activity arises when one brings goods purchased from a foreign or external source into another country.

Inappropriately exporting or importing goods, services or technology can result in the loss of these privileges. Therefore, it is important to understand IHS expectations if your work involves these activities. For information on export and import controls and related IHS procedures, please see our Import and Export Policy or see the import-export page on TheSource. You are additionally encouraged to contact our Corporate Compliance Department, our Legal Department, or anyone else listed in "Where to Seek Help and Report Concerns" with any related questions or concerns.

Anti-Boycott

Due to our global operations, we must be alert for illegal boycott requests. A "boycott" is a term used to describe situations where one person, group or country refuses to do business with certain persons, groups or countries as a means of protest. As a U.S. public company, we may not participate in or promote foreign boycotts that the United States does not support, such as the Arab League Boycott of Israel. This means that we may not agree to a contract, document or verbal request containing language that could be interpreted as an attempt to enforce an unsanctioned boycott. In addition, we may not refuse to consider a business opportunity with a boycotted country based upon boycott reasons alone.

Requests for boycott cooperation may be difficult to identify, but they commonly appear in contracts, letters of credit or bid or proposal materials. It is important to note that anti-boycott provisions apply to both interstate and foreign commerce activities, as well as to transactions that occur entirely outside of the United States.

If you receive a request to participate in any way in a boycott that is not required by the United States, immediately report it to our Corporate Compliance Department or our Legal Department, even if you refuse to participate or do not respond. If you have any questions about boycotts, please contact our Corporate Compliance Department, our Legal Department or reference our Import and Export Policy for more information.

Corporate Sustainability

As IHS continues to focus on driving long-term, sustainable and profitable growth, the environments and communities in which we live and operate must also be successful. To help ensure this success, we must conduct our business with corporate sustainability efforts in mind. IHS Corporate Sustainability is built upon three pillars: Philanthropy, Community, and Environment.

Philanthropy

IHS is committed to its colleagues, customers, communities and future generations. As such, our Company encourages each of us to engage in community outreach activities. One way we may wish to accomplish this is by giving our personal time and funds to support the charitable and political causes of our choice. Although this activity is permissible, we cannot use Company resources or the IHS name when making contributions to or involving ourselves in charitable, philanthropic or political activities without first ensuring that our actions adhere to our Corporate Philanthropy Policy. If you have any questions, please contact our Corporate Communications Department.

Community

IHS is committed to our colleagues, customers, communities and future generations, and we encourage colleagues to engage in community outreach activities. We believe in giving back to the communities where our colleagues work and live through volunteer efforts and team-driven community improvement initiatives. As with Philanthropy, we cannot use Company resources or the IHS name when participating in charitable, philanthropic or political activities without first ensuring that our actions adhere to our Corporate Philanthropy Policy.

Environment

As a multinational Company, we have a responsibility to one another and our local communities, as well as our global community, to protect the environment. This means that we should act in a manner that has the least negative impact on the environment surrounding us and the resources we use, including the land, air and water we share, and the offices and communities in which we operate. In particular, we should strive to have a positive benefit on our environment by following appropriate restorative and sustainable measures. In addition, we should work to meet or exceed the requirements set forth by the environmental laws, rules and regulations that apply to our business. This means we should strive to perform our job duties in a resource efficient and responsible manner, report potential environmental issues and seek advice regarding how to comply with environmental laws and regulations whenever necessary.



Waivers and Amendments

Any waivers of the provisions in this Code for executive officers or directors may only be granted by the Board of Directors or a Committee thereof and will be promptly disclosed to our Company's shareholders. Any waivers of this Code for other colleagues may only be granted by our Legal Department. Amendments to this Code must be approved by the Board of Directors or a Committee thereof and will be promptly disclosed to our Company's shareholders when doing so is required by law or regulation.

