

Morningstar, Inc.

Human Rights Global Policy

As amended and in effect on May 19, 2026

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

1. Scope and Applicability

Morningstar is committed to respecting human rights in all aspects of our business and to providing an equitable and ethical workplace. Our understanding of our responsibility to respect human rights encompasses our global operations and the activities of our employees, suppliers, and business partners. We support the principles set forth in the following international standards where applicable:

- A. The Universal Declaration of Human Rights.
- B. UN Guiding Principles on Business and Human Rights.
- C. International Labor Organization Conventions, Protocols and Recommendations.
- D. UN Principles for Responsible Investment.
- E. UN Global Compact.
- F. OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

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 commitment of the board of directors and Executive Leadership Team, Morningstar’s Legal function 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, and other relevant global policies found on the [Sustainability Policies and Reports Center](#), 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’s goal is to provide a workplace where every employee feels respected, valued, and comfortable. To preserve this atmosphere, Morningstar does not tolerate harassment, including sexual 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 aims to actively benchmark the Company's compliance with this commitment. This Global Policy is one component of Morningstar's commitment to a discrimination-free work environment. Employees can find further information in their respective regional Employee Handbook.

3. Commitment to Addressing Modern Slavery and Human Trafficking

Modern slavery and human trafficking are crimes and a violation of fundamental human rights. Morningstar takes a zero-tolerance approach to modern slavery and human trafficking in our business operations and supply chain. For more information on the Company's commitment to addressing modern slavery and human trafficking, as well as its adherence to related laws, please refer to the Morningstar Modern Slavery and Human Trafficking Statement, which is updated annually.

4. Expectations of Suppliers and Other Third Parties

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

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

5. Risk Management, Due Diligence, Training and Oversight

Morningstar conducts and intends to continue to enhance risk management and 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. Morningstar also provides company-wide training on our global policies and expectations for our employees upon hiring and on an annual basis, using globally consistent approach with a balanced distribution of training obligations throughout the year. This approach is intended to help employees remain informed and compliant while minimizing the impact on business operations. Mandatory company-wide trainings include human rights-related trainings covering modern slavery and human trafficking, ethics, and workplace harassment prevention.

To help 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 the Nominating and Corporate Governance Committee with an overview of the Company's compliance programs and corporate governance initiatives. Morningstar's Audit Committee also receives information regarding relevant complaints.

Morningstar seeks to investigate, address, and respond 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 aim to 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.