



S&P GLOBAL INC.

AUDIT COMMITTEE POLICY: EMPLOYEE COMPLAINT PROCEDURES REGARDING ACCOUNTING AND AUDITING MATTERS

Employee Complaint Procedures Regarding Accounting and Auditing Matters

Any employee of the Corporation may submit a good faith complaint regarding accounting or auditing matters to the management of the Corporation without fear of dismissal or retaliation of any kind. The Corporation is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. The Corporation's Audit Committee of the Board of Directors will oversee treatment of employee concerns in this area.

In order to facilitate the reporting of employee complaints, the Audit Committee has established the following procedures for: (1) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters ("Accounting Matters"); and (2) the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters.

Receipt of Employee Complaints

- Employees with complaints or concerns regarding Accounting Matters may forward such complaints or concerns on a confidential or anonymous basis either to: (1) the Corporation's Employee Hotline Program at www.spglobal.ethicspoint.com; or (2) by contacting the Audit Committee through the Corporation's Corporate Secretary, through e-mail or regular mail as follows: corporate.secretary@spglobal.com; Corporate Secretary, Attn: Audit Committee, S&P Global, 55 Water Street, New York, New York 10041.

Scope of Matters Covered by These Procedures

These procedures relate to employee complaints relating to any questionable accounting or auditing matters, including, without limitation, the following:

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Corporation;
- Fraud or deliberate error in the recording and maintaining of financial records of the Corporation;
- Deficiencies in or noncompliance with the Corporation's internal accounting controls;

- Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Corporation; or
- Deviation from full and fair reporting of the Corporation's financial condition

Treatment of Complaints

- Upon receipt of a complaint, the Corporate Secretary, working with Internal Audit, will: (i) determine whether the complaint actually pertains to Accounting Matters; and (ii) when possible, acknowledge receipt of the complaint to the sender.
- Complaints relating to Accounting Matters will be reviewed under Audit Committee direction and oversight by the General Counsel, Internal Audit or such other persons as the Audit Committee determines to be appropriate.
- Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.
- Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee.
- The Corporation will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding Accounting Matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

Reporting and Retention of Complaints and Investigations

- The Corporate Secretary will maintain a log of all complaints, tracking their receipt, investigation and resolution and shall include such complaints in the periodic summary report of employee related matters prepared by Internal Audit for the Audit Committee. Copies of complaints and such log will be maintained in accordance with the Corporation's document retention policy.

Nothing in this policy prohibits or restricts an employee from initiating communications directly with, or responding to an inquiry from, or providing information to, any self-regulatory organization or any other regulatory authority acting in a regulatory capacity, including the Securities and Exchange Commission and the Financial Industry Regulatory Authority (FINRA).

Audit Committee
As of December 15, 2016