



Bloomberg Australia – Modern Slavery Statement

1 Introduction

This Modern Slavery Statement (**Statement**) is made by Bloomberg L.P. (**BLP**, and, together with its subsidiaries, “**Bloomberg**”) for financial year ending 31 December 2022 on behalf of the following subsidiaries of BLP (such subsidiaries, collectively, the “**Reporting Entities**”):

- Bloomberg Australia Pty Ltd (ACN 622 777 851) (**BAPL**);
- Bloomberg Trading Facility Limited (ARBN 621 883 092) (**BTFL**),
- Bloomberg Trading Facility BV (ARBN 632 569 389) (**BTF BV**); and
- Bloomberg SEF LLC (ARBN 651 685 497) (**BSEF**).

Modern slavery remains a global issue and here at Bloomberg we are committed to playing our role in eradicating modern slavery. Bloomberg is committed to acting ethically and with integrity in all our business relationships. Our key values define who we are and how we operate. We believe profit and principles are not mutually exclusive; they reinforce one another. Doing the right thing – by our people, our customers, our communities, and our planet – is also the best thing for our business. More information regarding our company and our values can be found [here](#).

This Statement sets out the actions the **Reporting Entities** have taken to assess and address modern slavery risks within their operations and supply chains pursuant to the Australian *Modern Slavery Act 2018* (Cth).

2 Our Structure, Operations and Supply Chains

2.1 Our Structure

BLP is the parent company of BAPL, BTFL, BTF BV and BSEF. Bloomberg is a global leader in business and financial data, news, and insight. Bloomberg employs approximately 23,000 employees and workers in more than 160 locations around the world. Bloomberg’s global headquarters is located in the United States, at 731 Lexington Avenue, New York, NY 10022.

In addition to Bloomberg’s New York headquarters, Bloomberg has branches, subsidiaries, and operations in various jurisdictions throughout the Americas, Europe, the Middle East and Africa (EMEA) and the Asia Pacific (APAC) regions. Bloomberg Professional Services — the Bloomberg Terminal® and our enterprise data management and integration services — provide real-time data, breaking news, in-depth research, powerful analytics, and world-class execution capabilities to help financial professionals make smarter, faster and better-informed decisions.

BAPL

BAPL, a proprietary limited company formed under the laws of Australia with a branch registration in New Zealand, is the distributor of Bloomberg Professional Services in the Australia region.

BAPL employs approximately 150 employees, all based in Australia, within the Financial Solutions Product, News, Global Data, Engineering, Administration and Support functions. These employees are all highly qualified individuals. The majority of these employees are full-time permanent employees.

BAPL is a wholly-owned subsidiary of BLP.

BTFL

BTFL, a private limited company formed under the laws of England and Wales, and registered as a foreign company in Australia, is authorised by the UK's Financial Conduct Authority to operate a multilateral trading facility (**MTF**) and provides such services in Australia via its Australian market license from the Australian Securities and Investment Commission (**ASIC**). BTFL's MTF is a trading venue used by global institutions¹ for trading cash bonds, repos, credit default swaps, interest rate swaps, exchange-traded funds, equity derivatives and foreign exchange derivatives.

BTFL is a wholly-owned subsidiary of BLP.

BTF BV

BTF BV, a private limited company formed under the laws of the Netherlands, and registered as a foreign company in Australia, is authorised and regulated by the Autoriteit Financiële Markten and the Dutch Central Bank to operate an MTF and provides such services in Australia via its Australian market license from the Australian Securities and Investment Commission. BTF BV's MTF is a trading venue used by global institutions² for trading cash bonds, repos, credit default swaps, interest rate swaps, exchange-traded funds, equity derivatives and foreign exchange derivatives.

BTF BV is a wholly-owned subsidiary of BLP.

BSEF

BSEF, a limited liability company formed under the laws of the State of Delaware in the United States, is registered with the U.S. Commodity Futures Trading Commission as a swap execution facility and provides such services in Australia via its Australian market license from the Australian Securities and Investment Commission. BSEF is a trading venue used by global institutions for trading swaps in fixed income for interest rate swaps and credit default swaps as well as certain currency and commodity derivatives.

BSEF is a wholly-owned subsidiary of BLP.

2.2 Supply Chain

Bloomberg engages a mix of suppliers consisting of those with whom Bloomberg has long term relationships, and others with whom Bloomberg engages on an ad hoc or short-term basis. Bloomberg's direct supply chain includes the sourcing of goods and services to support the manufacturing, assembly, and infrastructure of the Bloomberg Terminal®, and the publishing and distribution of Bloomberg's printed news products. In addition, Bloomberg sources products and services to support office-based and administrative operational needs, including but not limited to:

- Property and utilities;
- Facilities management and maintenance, including cleaning and security;
- Information technology network/equipment, accessories, software and consulting services;

¹ Please note that certain financial instruments may not be available in all jurisdictions or to everyone.

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- Warehousing, distribution and logistics;
- Human resources such as benefits, training, recruitment and contingent workers;
- Financial services, including banking services and insurance;
- Media, marketing, and events travel and hospitality;
- Professional services such as accounting, audit, legal and tax consulting; and
- Data destruction, assets disposition, equipment refurbishments and collection.

In addition:

- **BAPL** engages suppliers located predominantly in Australia and to a lesser extent in New Zealand, Japan and Hong Kong;
- **BTFL** engages suppliers located predominantly in the United Kingdom and to a lesser extent in Sweden and the United States;
- **BTF BV** engages suppliers located predominantly in the Netherlands and to a lesser extent in the United Kingdom and the United States; and
- **BSEF** engages suppliers located predominantly in the United States and to a lesser extent in Germany and the United Kingdom.

BLP also licenses the Bloomberg Professional Services — the Bloomberg Terminal® to BAPL for distribution in Australia.

3 Modern Slavery Risks in our Operations and Supply Chains

3.1 In Our Operations

Given the nature of Bloomberg's operations and the profile of our workforce, we consider the risk of modern slavery occurring in our operations to be very low. For example, our workforce is primarily comprised of employees who work in professional, office-based roles which reduces the level of modern slavery risk.

All Bloomberg employees are provided with remuneration exceeding minimum wage and salaries are benchmarked based on individual roles. Bloomberg maintains recruitment policies that stipulate minimum legal working age requirements, which mitigates the risk of child labour entering our workforce. Bloomberg respects human rights in line with the United Nations (UN) Guiding Principles on Business and Human Rights and all applicable laws concerning modern slavery, including forced and child labour.

Bloomberg is also committed to supporting the mental and physical health of all employees. Bloomberg provides resources to all employees to care for their mental health and to ensure they stay healthy. Bloomberg also equips managers with the resources they need to appropriately support their team members.

3.2 In Our Supply Chain

Bloomberg considers the risk of modern slavery existing within its first-tier suppliers domiciled in Australia, a country with low prevalence for modern slavery according to the Global Slavery Index³, to be low. Where we operate in jurisdictions where modern slavery is more prevalent, or where we have suppliers in such locations this increases the inherent risks.

³ <https://www.globalslaveryindex.org/>

Globally, a large number of our first-tier suppliers are likely to rely on global supply chains for the provision of goods and/or services provided to us. We are aware that the risk of modern slavery may be higher in relation to suppliers from the following higher risk sectors and products:

- Cleaning services;
- Facilities management;
- Food and beverage, travel and hospitality;
- Office supplies;
- IT and telecommunications hardware;
- Promotional materials; and
- Logistics and transportation.

4 Actions to Address and Assess Modern Slavery Risks

4.1 In Our Operations

Bloomberg maintains policies and procedures applicable to the Reporting Entities that help to ensure that its employees are working of their own free will. These policies and procedures include passport and visa status checks to confirm that individuals have the rights to work. We obtain appropriate work authorisation for those who need them. All employees must also provide a tax file number which is used as verification that employees are of the minimum working age.

The anti-slavery policy in Bloomberg's Global Resource and Information Core Guide (**the Guide**) requires employees to take responsibility for preventing, detecting, and reporting instances of modern slavery in any part of Bloomberg's business or supply chains. The Guide, which is reviewed on an annual basis, requires staff to conduct themselves to the highest ethical standards.

Bloomberg and the Reporting Entities' Whistleblowing Policies and Guide sets out the process for employees to report concerns, including suspected breaches of the Guide. If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, the Guide requires that the employee escalate this information to their manager, Human Resources (HR), or through the anonymous Bloomberg Ethics Hotline. The Bloomberg Ethics hotline has been enhanced to include modern slavery as a separate reporting category. To encourage reporting by employees and third parties, Bloomberg has established systems that protect whistle-blowers from retaliation and detrimental treatment.

BLP has a mandatory training requirement for modern slavery. In the reporting period, a new and enhanced modern slavery e-learning training module was launched which highlights the significance and risks of modern slavery and human trafficking, our employees' obligations in this context, how to report concerns and the steps Bloomberg is taking to identify and mitigate the risk of modern slavery in our supply chains. The training includes a knowledge assessment and has been provided to any individuals identified as having potentially greater interaction with vendors/suppliers, including Media, Workplace Operations, Vendor Risk Management, Procurement, Travel and Expenses, Legal & Compliance, Human Resources and News. The completion rate of this training is being measured. At the time of reporting, more than 99% of the target audience had successfully completed the training.

As part of its training programme, Bloomberg requires all employees to undertake an annual review and attestation of policies relating to standards of conduct and ethical behaviour, including the Guide

(see above). We are committed to maintaining these steps which seek to ensure no modern slavery or human trafficking exists in our supply chain or in any part of our business.

4.2 Our Supplier Code of Conduct

Bloomberg's Supplier Code of Conduct (the **Code**) requires our suppliers to commit to upholding the human rights of workers and treating them with dignity and respect. The Code outlines Bloomberg's expectations for supplier conduct regarding labour and human rights, health and safety, environmental protection, ethics, and management practices based on international standards.

The Code prohibits all forms of modern slavery both within its business operations and supply chains. Suppliers must comply with all applicable modern slavery and human trafficking laws, statutes, regulations and codes and not engage in any activity, practice or conduct that would constitute an offense under any applicable modern slavery laws or regulations in effect. The Code is currently being updated to specifically reference Bloomberg's zero tolerance policy towards Modern Slavery in both its operations and supply chain and to provide reference to Bloomberg's Modern Slavery Statements.

Bloomberg's supplier contracts require suppliers to ensure full compliance with the Code and to comply with all laws, including those relating to anti-slavery and human trafficking, anti-discrimination, work health and safety, authorisation to work, anti-bribery and conflict minerals. Although our business partners manage their operations, we expect those in our supply chain to align with our values and operate in accordance with the principles of the Code (<https://www.bloomberg.com/procurement>), the Bloomberg Impact Report (<https://www.bloomberg.com/impact>), and in full compliance with all applicable laws and regulation.

4.3 Vendor Management

Bloomberg recognizes the risk to the company in working with vendors and takes a risk-based approach to managing all vendor relationships. BLP maintains and oversees a vendor management lifecycle framework to ensure that our approach to vendor management is supported by standards of high governance which is documented in our Vendor Management Policy.

We are committed to enhancing our vendor management lifecycle framework to include vendor selection criteria based on, the geographic risk of the location(s) from which the vendor provides services or products, which takes into consideration human rights and modern slavery risk factors. This will enable us to identify products or services that may be produced in high-risk jurisdictions. During the Reporting Period, we have initiated the steps necessary to scope requirements to determine the highest risk vendors for modern slavery and we are committed to continued implementation of the due diligence requirements for vendor-related modern slavery risks in future reporting periods.

5 Assessing the Effectiveness of our Actions

Bloomberg's employees and third parties are encouraged to report incidents of modern slavery to HR or through the Bloomberg Ethics Hotline, which is accessible 24 hours a day, 7 days a week, 365 days per year.

Despite our low-risk operations, we have identified enhancements to our existing control, which will continue to improve our ability to identify and mitigate modern slavery risk in our operations and supply chain. These enhancements include the following:

- Launch new modern slavery working group to formally bring together key stakeholder across Bloomberg to provide general oversight of modern slavery risk and to implement and enhance modern slavery controls
- Enhance Supplier Code of Conduct to specifically reference Bloomberg's zero-tolerance policy towards modern slavery and to reference Bloomberg's modern slavery statements

- Introduce modern slavery risk assessment questions for high-risk vendors to assess their commitment to detecting and addressing modern slavery in their operations and supply chains and leverage this data to better understand the modern slavery risk profile and define additional steps when risk factors are identified;
- Further enhance existing controls to identify vendors at higher risk for modern slavery in order to capture additional information and determine next steps, including defining modern slavery risks relative to geography and industry;
- Following the implementation of further enhancements, perform an internal assessment of the processes, using a risk-based approach and report results to senior management; and
- To assess actions taken and to measure control effectiveness, further key management information (KRI/KPIs) will be defined, and we will continue to capture and track trends in indicative key data metrics such as percentage of employees that have completed training, percentage of vendor's performing services in higher risk geographies and commitments to addressing modern slavery in their supply chains.

6 Other Information

Bloomberg supports charitable institutions dedicated to combating modern slavery and human trafficking. We work with more than 2,000 organizations worldwide, many of which aim to advance basic human rights including safety, education, and food security. At Bloomberg, we are committed to giving back to the cities in which we live and work, using the expertise of our employees and resources of our business to create lasting impact.

Our Corporate Philanthropy website at <https://www.bloomberg.com/philanthropy> provides further information about our charitable initiatives.

7 Consultation and Approval

This Statement was prepared in consultation with stakeholders from multiple departments within Bloomberg including Human Resources, Legal & Compliance, Supply Chain, Vendor Risk Management, Procurement and Finance. All members held global and/or regional roles and were able to input in relation to the mandatory criteria for all the Reporting Entities.

This Statement has been approved by the General Partner of Bloomberg L.P., as Bloomberg L.P.'s principal governing body, on May 16, 2023 in compliance with the Australian Modern Slavery Act 2018 (Cth). Bloomberg L.P is the parent entity of each of the Reporting Entities.

For and behalf of Bloomberg L.P.

Signed by:

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Peter Grauer

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Peter T. Grauer (Chairman)

Bloomberg L.P.

Date: May 16, 2023