



## Bloomberg Australia – Modern Slavery Statement

### • 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 2021 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**).

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 *Modern Slavery Act 2018* (Cth).

Bloomberg is committed to acting ethically and with integrity in all its 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](#).

### • Our Structure, Operations and Supply Chains

#### ○ 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 20,000 employees and workers in 176 locations around the world. Bloomberg’s global headquarters are located in the United States, at 731 Lexington Avenue, New York, NY 10022.

In addition to Bloomberg’s New York headquarters, Bloomberg has branches and operations in various jurisdictions throughout the Americas, EMEA and APAC. 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 robust trading venue used by global institutions<sup>1</sup> 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 robust trading venue used by global institutions<sup>2</sup> 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.

○ **Supply Chain**

Bloomberg engages a mix of suppliers consisting of those with whom Bloomberg has long term relationships, and others with whom Bloomberg contracts on a more ad hoc/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:

- property and utilities;
- facilities management and maintenance, including cleaning and security;
- information technology network/equipment, accessories, software and consulting services;
- warehousing, distribution and logistics;

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

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- 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 to BAPL for distribution in Australia.

- **Modern Slavery Risks in our Operations and Supply Chains**

- **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.

- **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 Index<sup>3</sup>, 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.

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:

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<sup>3</sup> <https://www.globallslaveryindex.org/>

- cleaning services;
- facilities management;
- food and beverage, travel and hospitality;
- office supplies;
- IT and telecommunications hardware;
- promotional materials; and
- logistics and transportation.

- **Actions to Address and Assess Modern Slavery Risks**

### 1.1 In our Operations

Bloomberg maintains policies and procedures applicable to the Reporting Entities that help to ensure that its employees are working of their free will. These policies and procedures include passport and visa status checks to confirm that individuals have rights to work. 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 (**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. To encourage reporting by employees and third parties, Bloomberg has established systems that protect whistleblowers from retaliation and detrimental treatment.

Bloomberg has recently enhanced its e-learning training module for modern slavery by highlighting how employees can identify potential risks and to whom such risks should be reported and providing information on the steps Bloomberg is taking to identify and reduce the risk of modern slavery in our supply chain. This training has been provided to an expanded target audience which includes employees within the following departments: News, Media, External Relations, HR, Legal & Compliance, Global Procurement, Contracts, Workplace Operations, Travel & Expense and Vendor Risk Management. As at the time of reporting over 90% of the target audience had already completed the e-learning 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.

### 1.2 Our Supplier Code of Conduct

Bloomberg's Supplier Code of Conduct (**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 external standards and guidelines listed in the reference section of the Code.

The Code requires suppliers to ensure that all work is conducted on a voluntary basis, there is no use of child labour in supply chains, workers under 18 are not required to perform hazardous work, working hours are not excessive, wages are paid in compliance with applicable laws, harsh and inhumane treatment or threats of such treatment are prohibited, workplaces are free of harassment and unlawful discrimination and provide freedom of association.

Bloomberg's supplier contracts require suppliers to ensure full compliance with the Code and to comply with all laws, including those relating to 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 Risk Management Program

Bloomberg takes a risk-based approach to managing our vendor relationships. As such, we maintain a Vendor Risk Management program to identify vendor-related risks through a uniform and consistent engagement-level inherent risk assessment questionnaire. Based on the risks identified, due diligence activities may be performed before a vendor agreement is executed or a purchase order is issued to the vendor. Our approach to managing vendor related risks is documented in our Vendor Management Policy and Procure-to-Pay Vendor Risk Management Standards.

The Vendor Engagement Inherent Risk Assessment Questionnaire identifies, among other risk categories, the geographic risk of the location(s) from which the vendor provides services or products. This enables us to identify products or services that may be produced in high-risk jurisdictions. During the Reporting Period, the Vendor Management program did not include risk identification or due diligence requirements specific to modern slavery risk. As part of planned enhancements to our supplier onboarding process, when new vendors are onboarded, we will be assessing their commitment to detecting and addressing modern slavery in their supply chains. We are committed to further enhancing these requirements for vendor-related modern slavery risks in future reporting periods.

- **Assessing the Effectiveness of our Actions**

Bloomberg's employees 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:

- Include in the vendor onboarding questionnaire a question to assess a vendor's commitment to detecting and addressing modern slavery in their supply chains and determine what additional due diligence steps are required where red flags are identified;
- Further enhance existing controls to identify vendors at higher risk for modern slavery (through the identification of high risk geographies and high risk industries) and determine next steps for appropriate remediation if needed;
- Once enhanced controls are fully implemented, perform an internal assessment of the process using a risk-based approach and report results to senior management;
- As we aggregate data on supplier compliance, any identified non-compliance will be tracked by our Vendor Issue Management process and the appropriate actions taken; and
- To assess actions taken and to measure impact, we will 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.

- **Other Information**

Bloomberg supports charitable institutions dedicated to combating modern slavery and human trafficking. We work with more than 1,700 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.

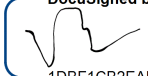
- **Consultation and Approval**

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 June 10, 2022. 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 T. Grauer (Chairman)**

**Bloomberg L.P.**

*Date: June 10, 2022*