



Bloomberg Australia – Modern Slavery Statement

1 Introduction

This Modern Slavery Statement (**Statement**) is made by the following entities:

- Bloomberg Australia Pty Ltd (ACN 622 777 851) (**BAPL**);
- Bloomberg Trading Facility Limited (ARBN 621 883 092) (**BTFL**); and
- Bloomberg Index Services Limited (ARBN 623 032 280) (**BISL**),

together, the **Reporting Entities (we, us, our)**, for financial year ending 31 December 2020 (**Reporting Period**), and sets out the actions we have taken to assess and address modern slavery risks within our operations and supply chain pursuant to the *Modern Slavery Act 2018* (Cth).

The Reporting Entities are 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](#).

2 Our Structure, Operations and Supply Chains

2.1 Our Structure

Bloomberg L.P (**BLP**) is the parent company of BAPL, BTFL and BISL. BLP and its subsidiaries are the global leaders in business and financial data, news and insight. BLP and its subsidiaries have around 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 BLP'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

In the Australia region, Bloomberg Professional Services are distributed by BAPL. BAPL is a wholly-owned subsidiary of BLP and maintains a branch registration in New Zealand.

BAPL has approximately 157 employees, all based in Australia, within the Financial Product, News, Global Data, Engineering, External Relations, Administration and Support functions. These employees are all highly qualified individuals. The majority of these employees are full-time permanent employees.

BISL

BISL, a wholly-owned subsidiary of BLP formed under the laws of England and Wales, maintains a branch registration in Australia. BISL provides benchmark administration services across multiple asset classes. With expertise in capital markets, technology, data, pricing, analytics, distribution and research, BISL provides the global investment community with comprehensive solutions to fulfil their benchmarking needs.

BISL has approximately 88 employees, based in London and Americas. Roles include index solution specialists, product and risk analysts and data management, which are all in professional desk based roles. All employees of BISL are full-time and permanent employees.

BTFL

BTFL, a wholly-owned subsidiary of BLP formed under the laws of England and Wales, provides a multilateral trading facility (MTF) in Australia. BTFL is authorised by the UK's Financial Conduct Authority to operate a MTF. BTFL's MTF is a robust trading venue used by global institutions for trading cash bonds, repos, credit default swaps, interest rate swaps, exchange-traded funds, equity derivatives and foreign exchange derivatives. It does not have any branches.

2.2 Supply Chain

During the Reporting Period, BAPL, BISL and BTFL engaged suppliers from industries including:

- Building and facility construction, facilities maintenance, including cleaning and security;
- Utilities;
- Human resources related such as benefits, training, recruitment and contingent workers;
- IT/network related equipment, accessories and software and consulting services;
- Financial services, including banking services and insurance;
- Media, marketing and events;
- Travel and hospitality;
- Professional services such as accounting, audit, legal, tax consulting;
- Warehousing, logistics and distribution; and
- Data destruction, assets disposition, equipment refurbishments and collection.

The majority of the suppliers engaged by BAPL are domiciled in Australia and some are domiciled in the United States, Singapore and Hong Kong. BTFL and BISL predominantly engage suppliers in the jurisdictions in which they operate. All Reporting Entities have a mix of suppliers with whom they have long term relationships and others on more ad hoc/short term contracts. BLP also licenses the Bloomberg Professional Services to BAPL for distribution in Australia.

3 Modern Slavery Risks in our Operations and Supply Chains

3.1 In our Operations

Given the nature and location of our 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.

We operate in jurisdictions where the rights of employees are legislated. All of our employees are provided with remuneration exceeding minimum wage, and are afforded protection under local workplace laws and regulations. Salaries are benchmarked based on individual roles. There are also recruitment policies in place stipulating minimum legal working age requirements which mitigates the risk of child labour entering our workforce.

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

We consider the risk of modern slavery occurring within our Australian domiciled first tier suppliers to be low, given it is a country with low prevalence for modern slavery according to the Global Slavery Index. Where we operate in jurisdictions with a higher modern slavery risk, this increases the inherent risk in our supply chain in these locations, given that we usually engage local suppliers.

Globally, a large number of our direct 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

As in our operations in Australia, BLP has in place policies and procedures applicable to the Reporting Entities, to ensure that its employees are working of their free will. These include passport and visa status checks to ensure 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.

BLP's Global Resource and Information Core Guide (**Guide**) includes modern slavery, making the prevention, detection and reporting of modern slavery in any part of the business or supply chains the responsibility of all those who work at Bloomberg. Our Guide, requires staff to conduct themselves to the highest ethical standards.

BLP 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 makes it clear that it should be raised with their Manager or HR, or through the anonymous Bloomberg Ethics Hotline.

BLP has e-learning training for Human Trafficking which highlights the significance and risks of modern slavery and human trafficking, and our employees' obligations in this context. This training is provided to targeted employees within the following departments: News, Media, External Relations, Global Procurement, Accounts Payable, Contracts, Supply Chain and Negotiations. A review of the existing training will be conducted to upgrade the offering in this area and to ensure the target audience continues to be appropriate.

As part of its training programme Bloomberg (including its subsidiaries or affiliates) also requires all employees to undertake an annual review and attestation of policies relating to standards of conduct and ethical behaviour, including the Guide. Bloomberg is 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

BLP'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 section on human rights 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 comply with all laws, including those relating to anti-discrimination, work health and safety, authorisation to work, anti-bribery and conflict minerals.

Vendor Risk Management Program

Bloomberg recognises the risk to the company in working with vendors and 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 Standard and Vendor Information Risk Standard.

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 Risk Management program did not include risk identification or due diligence requirements for modern slavery risk. We are committed to developing these requirements for vendor-related modern slavery risks in future reporting periods.

5 Assessing the Effectiveness of our Actions

We aim to undertake the following actions which will assist in identifying and mitigating modern slavery risk in our operations and supply chain:

- Once controls are implemented we will perform an internal assessment of the process, using a risk-based approach, including appropriate consideration of high-risk geographies. Results will be reported to senior management;
- As we amass data on supplier compliance, any identified non-compliance will be tracked by our Vendor Issue Management process; 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.

6 Other Information

Bloomberg supports charitable institutions dedicated to combating modern slavery and human trafficking. We work with more than 1,500 organisations 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

We established a Modern Slavery Working Group to develop this statement. The members from this group were drawn from multiple departments including Human Resources, Compliance, Supply Chain, Vendor Risk Management, Procurement, Finance and Legal. Its members all held global and/or regional roles and were able to input in relation to the mandatory criteria for all the Reporting Entities.

This Statement was approved by the General Partner of Bloomberg L.P., as Bloomberg L.P.'s principal governing body, on 22 June 2021. Bloomberg L.P is the parent entity of each of the Reporting Entities.

Signed by:
Peter Grauer
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Peter T. Grauer

Chairman

Bloomberg L.P.