

Bloomberg - Australia Modern Slavery Statement

1. Introduction

This Modern Slavery Statement (**Statement**) is made in accordance with the *Australian Modern Slavery Act 2018* (Cth) (the **Act**) for the financial year ended 31 December 2025, except where otherwise indicated, on behalf of the following entities (collectively, the **Reporting Entities**):

- Bloomberg Australia Pty Ltd (ACN 622 777 851) (**BAPL**);
- Bloomberg Tradebook Singapore Pte Ltd (ARBN 646 092 417) (**BTSP**);
- 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**).

Each of the Reporting Entities is a subsidiary of Bloomberg L.P. (**BLP**, and, together with its subsidiaries, including the Reporting Entities, **Bloomberg**) and is part of Bloomberg's global compliance and risk management program (as described throughout this Statement).¹

Forced and child labour, modern slavery, human trafficking and involuntary servitude (referred to collectively in this Statement as **Modern Slavery**) remain global issues and Bloomberg is committed to playing its role in helping to eradicate them. Bloomberg is committed to acting ethically and with integrity in all our business relationships. More information regarding our company and our values can be found on our website ([here](#)).

This Statement sets out the actions the Reporting Entities have taken, as part of Bloomberg's global compliance and risk management program, to assess and address Modern Slavery risks within their operations and supply chains pursuant to the Act.

2. Our Structure, Operations and Supply Chains

2.1 Our Structure and Operations

Bloomberg L.P. (BLP)

BLP, a limited partnership organised under the laws of the State of Delaware, is a global leader in business and financial data, news and insight. Bloomberg maintains its global headquarters 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 and the Asia Pacific regions.

Bloomberg Australia Pty Ltd (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's employees are all based in Australia and employed within the Financial Solutions News, Product, Data, Engineering, Finance & Administration and Human Resources functions. These employees are all highly qualified individuals. The majority of these employees are full-time

¹ Please note that neither BLP nor any other Bloomberg entity other than the Reporting Entities are subject to reporting obligations under the Act for the 2024 reporting period.

permanent employees.

BAPL is a wholly-owned subsidiary of BLP. BAPL does not have an ownership interest in or control any other entities.

Bloomberg Trading Facility Limited (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 licence from the Australian Securities and Investment Commission (**ASIC**). BTFL'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.

BTFL is a wholly-owned subsidiary of BLP. BTFL does not have an ownership interest in or control any other entities.

Bloomberg Trading Facility BV (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 licence from the ASIC. BTF BV's MTF is a trading venue used by global institutions³ 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. BTF BV does not have an ownership interest in or control any other entities.

Bloomberg Tradebook Singapore Pte Ltd (BTSPL)

Bloomberg Tradebook Singapore Pte Ltd (BTSPL), a private limited company formed under the laws of Singapore, is registered as a foreign company in Australia and is authorised and regulated by the Monetary Authority of Singapore (the "MAS") as a recognised market operator ("RMO"). BTSPL provides services in Australia via its Australian Market License from the ASIC. BTSPL makes available a negotiation system, BTBS, used by global institutions⁴ for trading cash bonds, repos, credit default swaps, interest rate swaps, exchange-traded funds, equity options, listed futures, and foreign exchange derivatives.

BTSPL is a wholly-owned subsidiary of BLP. BTSPL does not have an ownership interest in or control of any other entities.

Bloomberg SEF LLC (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 the U.S. Securities and Exchange Commission as a security-based swap execution facility. BSEF provides such services in Australia via its Australian market licence from the ASIC. BSEF is a trading venue used by global institutions for trading swaps in fixed income for interest

² Please note that certain financial instruments may not be available in all jurisdictions or to everyone.

³ Please note that certain financial instruments may not be available in all jurisdictions or to everyone.

⁴ Please note that certain financial instruments may not be available in all jurisdictions or to everyone.

rate swaps and credit default swaps as well as certain currency and commodity derivatives.

BSEF is a wholly-owned subsidiary of BLP. BSEF does not have an ownership interest in or control any other entities.

The Reporting Entities are included in Bloomberg's global compliance and risk management program.

2.2. Supply Chain

Bloomberg engages a mix of global and local 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 used in connection with the provision of the Bloomberg Terminal® service and data products 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 services;
- Information technology networks and equipment software providers;
- Warehousing, distribution and logistics;
- Human resources;
- Corporate and professional services;
- Media, marketing and events;
- Data services, equipment and asset lifecycle management; and
- Travel and hospitality.

The Reporting Entities share the same supply chain as Bloomberg.

3. Modern Slavery Risks in our Operations and Supply Chains

3.1. In Our Operations

We do not believe there is a meaningful risk of Modern Slavery in our own operations. In that regard, we are not a manufacturing company; our business activities focus on providing various news and information services, data, analytics and trading-related services and functionalities. Our workforce is primarily comprised of employees who work in professional, office-based roles and our hiring, compensation and employee relations practices are such that the risks of our employing workers under the legal age, or anyone against their will, are negligible.

3.2. In Our Supply Chain

We believe there is a low risk of Modern Slavery among our critical first-tier suppliers, as the majority of such suppliers are domiciled in countries with a low prevalence of Modern Slavery, according to the Global Slavery Index. However, we recognize that risks still exist in low prevalence countries and that, when our suppliers are domiciled and/or providing services in jurisdictions where Modern Slavery is more prevalent, there may be increased inherent risk in our

supply chain.

Globally, a large number of our first-tier suppliers are also 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 such suppliers in certain locations and/or industries, sectors, or products. We have taken a number of steps to reduce these risks and are enhancing our procedures for identifying and managing risks across these goods, services and jurisdictions. We continue to assess and enhance our mitigation measures through our vendor risk management processes, as described further in the Vendor Management section below. The products and services in our supply chain that we consider to have a higher risk of Modern Slavery include the following:

- 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 the Risk of Modern Slavery

4.1 In Our Operations

We maintain policies and procedures applicable to the Reporting Entities that help to ensure that our employees are working of their own free will. These policies and procedures include passport and visa status checks to confirm that individuals have the right to work. Where required, we obtain appropriate work authorisation for those who need them. All employees must also provide appropriate government-issued documentation to verify employees are of the minimum working age applicable to the laws of their jurisdiction.

Bloomberg's [Code of Ethics](#), published in 2026, sets out the ethical principles underlying our company, including conducting ourselves and our business in accordance with the highest ethical standards — responsibly, honestly and in compliance with applicable laws and regulations — and operating and communicating with integrity, transparency and accountability. Bloomberg's Global Resource and Information Core Guide and Contingent Worker Policy Guide (together, the **Guides**) also require employees and contingent workers, respectively, to conduct themselves in accordance with these ethical standards and expectations. The Guides are reviewed and updated on an annual basis.

The Code of Ethics and the Guides set out the processes for employees and contingent workers, respectively, to report concerns, including suspected breaches of the Code of Ethics and Guides. If a staff member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any kind of unlawful or unethical behaviour, the Code of Ethics and the Guides state that they should immediately notify their manager, Legal & Compliance, Human Resources (HR) or through the anonymous [Bloomberg Ethics Hotline](#), which is accessible 24 hours a day, 7 days a week, 365 days per year in multiple languages. Third parties who have concerns about these topics can also raise them via Bloomberg's 24x7 Ethics Hotline. To encourage reporting by employees, contingent workers and third parties, we have

established systems that protect whistleblowers from retaliation and detrimental treatment.

We have employee training on the topic of Modern Slavery. The e-learning training module, launched in 2024, highlights the significance and risks of Modern Slavery, 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 is mandatory for personnel 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 measured annually. For the reporting period, more than 99% of the mandatory audience successfully completed the training.

Additionally, as part of our training program, we require all employees to undertake an annual review and attestation of policies relating to standards of conduct and ethical behaviour, including the Code of Ethics and Global Resource and Information Core Guide. We require all contingent workers to review and attest to such policies applicable to them, as set forth in the Contingent Worker Policy Guide, at the time of engagement. We are committed to maintaining these steps, which are intended to mitigate the risks of Modern Slavery existing in our supply chain or in any part of our business.

4.2 Our Supplier Code of Conduct

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

The Supplier Code prohibits all forms of Modern Slavery both within suppliers' business operations and supply chains. Suppliers must comply with all applicable Modern Slavery related laws, statutes, regulations and codes and not engage in any activity, practice or conduct that would constitute an offence under any applicable Modern Slavery laws or regulations. The Supplier Code states our zero-tolerance policy toward Modern Slavery in both our operations and supply chain.

Our supplier contracts require suppliers to ensure full compliance with the Supplier Code and to comply with all applicable laws, including those relating to Modern Slavery, anti-discrimination, work health and safety, authorisation to work, anti-bribery and conflicts of interest. We expect those in our supply chain to align with our values and operate in accordance with the principles of the Supplier Code and in full compliance with all applicable laws and regulations. The same is also reflected in our Code of Ethics.

4.3 Vendor Management

Bloomberg recognizes the risks inherent in working with vendors and takes a risk-based approach to managing vendor relationships. We maintain and oversee a vendor management lifecycle framework to ensure that our approach to vendor management is supported by appropriate governance standards, which is documented in our Vendor Management Policy. Accordingly, we may decline to do business with or exit a vendor relationship due to labour practice or other concerns.

We continue to enhance our vendor management lifecycle framework by incorporating geographic risk-based vendor selection criteria, including Modern Slavery risk factors associated

with the locations from which vendors provide services or products. Our vendor management processes and supporting policies are subject to regular review and continuous improvement, as further described in this Statement.

5. Assessing the Effectiveness of our Actions

Bloomberg's employees and third parties are required to report suspected incidents of Modern Slavery to their manager, Legal & Compliance, HR or through the anonymous Bloomberg Ethics Hotline.

In addition to the ongoing areas of enhancement and goals discussed elsewhere in this Statement, Bloomberg's continued areas of focus include:

- Evaluating the scope of vendors for which we are conducting Modern Slavery assessments and making necessary adjustments to provide adequate coverage;
- Tracking key data metrics, including the percentage of employees that have completed our Modern Slavery training;
- Assessing the mandatory audience for trainings; and
- Monitoring key performance data gathered through our assessments to support the continuous enhancement of our processes.

6. Consultation and Approval

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

Solely for purposes of the Act, and in accordance with Section 14(2)(d)(ii) of the Act, on behalf of each of 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 27, 2026. Bloomberg L.P. is the parent entity of each of the Reporting Entities.

Signed by:

Bloomberg L.P.

By: Bloomberg Inc., its general partner

Signed by:

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Name: Patti Roskill

Title: Treasurer of Bloomberg Inc.

Date: May 27, 2026