

2017 Appendix

Bloomberg Impact Report

GUIDING PRINCIPLES OF BLOOMBERG EDITORIAL

- **It isn't news if it isn't true.** Accuracy is the most important principle in journalism. There is no such thing as being first with news if we're wrong.
- **Show, don't tell.** Support statements and assertions with facts, figures and anecdotes. Write with nouns and verbs; be sparing with adjectives and adverbs.
- **News is a surprise.** What do we know today that we didn't know yesterday? That question will offer guidance when deciding which facts to highlight first. Why are we reporting this? Why are we reporting this now? No story is worth writing unless we answer these questions for our readers.
- **Names make news.** People want to read and hear about people—the actors and the victims. The bigger the name, the bigger the audience.
- **Not invented here.** We immediately report news from other organizations and then seek to advance the story. We don't accept the frequent lapse in journalism that if we didn't break the news, it didn't happen, and we should never fail to acknowledge who did break the news.
- **Follow the money.** Explaining the role of money in all its forms— from capital flows to executive compensation to the cost of an acquisition to election spending—reveals the meaning of the news. We then examine how that information relates to shareholders, bondholders and anyone else with money at stake.
- **One story for all.** Write with a style and simplicity that a layman can understand and a professional can appreciate.
- **The more we prepare, the luckier we will be.** We develop the necessary sources and knowledge in advance so we can deliver our best judgment when news breaks. That is what readers, listeners and viewers need most at the moment their interest is greatest.
- **We adhere to the Five Fs.** We strive to be the most Factual word on any topic, the First to report the news and the Fastest to report the details. We should also be the Final word -- or the most definitive source -- on major events as well as the Future word that tells our audience what's next.

People

Our Equal Employment Opportunity Policy

Bloomberg Global Resource and Information Core Guide

OUR EQUAL EMPLOYMENT OPPORTUNITY POLICY

As stated in Bloomberg's Global Resource and Information Core Guide:

Bloomberg is committed to attracting, retaining, developing and promoting the most qualified individuals without regard to race, color, religion or belief, sex, national or ethnic origin, ancestry, age, marital status, sexual orientation, gender identity, genetic predisposition or carrier status, protected veteran status/service, pre-JVA veteran status, physical or mental disability, or any other classification protected by applicable law. As such, Bloomberg is committed to treating all applicants and employees in a non-discriminatory manner with respect to the terms and conditions of employment. This policy governs all aspects of employment, including recruitment, selection, job assignment, promotion, lay-off, recall from lay-off, training, education, social and recreation programs, transfer, compensation, discipline, termination, and access to benefits. Moreover, Bloomberg will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, the pay of another employee or applicant may not be discussed or disclosed unless such employee or applicant provides verbal or written consent, either directly or indirectly, or unless otherwise permitted under applicable law. In addition, employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing or action, (c) consistent with Bloomberg's legal duty to furnish information, or (d) otherwise in accordance with applicable law. Employees are prohibited from engaging in any type of unlawful discrimination. Anyone who believes that they have been the subject of discrimination should contact their Manager, a Human Resources representative, Ken Cooper, Beth Mazzeo, or Peter Grauer.

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Policies

Standards

Procedures

**Global Resource and Information
Core Guide**

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Introduction

Purpose

This Global Resource and Information Core Guide (the "Guide") and, where applicable, the supplement specific to your region, are found on HR<GO>. They are designed to acquaint you with Bloomberg L.P. and its subsidiaries and affiliates ("Bloomberg" or the "Company") and to provide you with supplemental information about your working conditions, benefits, responsibilities, and some of the policies affecting your employment. This Guide and any corresponding supplement are applicable to employees only. You should read, understand, and comply with all provisions of this Guide. You should also consult your offer letter and/or employment contract, where applicable, for additional terms and conditions that may apply and supplement the terms herein.

Failure to comply with this Guide and any referenced policies and/or underlying procedures, including the Client Data Principles and related policies and procedures, or any other company policy, may result in significant negative impact to Bloomberg, and may give rise to civil and/or criminal liability.

All managers and team leads ("Managers") shall take appropriate action to correct violations of this Guide and/or any underlying policies or procedures, including the Client Data Principles and related policies and procedures. In addition, individuals found to have violated the Guide or the Client Data Principles or related policies, may be subject to disciplinary action which shall be consistent with the severity of the incident, and which (to the extent permissible by local law) may include, but not be limited to:

- Loss or reduction in compensation;
- Loss or diminishment of responsibilities and/or advancement opportunities;
- Dismissal;
- Cancellation of contracts;
- Legal prosecution; and
- Other actions as deemed appropriate by Bloomberg

No guide can anticipate every circumstance or question about policy. As such, we expect our employees to exercise good judgment in their behavior, and should an employee become aware of behavior by others that appears to violate Company policy or which seems questionable, it should be reported. In addition, as Bloomberg continues to grow, the need may arise, and Bloomberg reserves the right, to revise, supplement, or rescind any policies, procedures, or portion of this Guide at any time as it deems appropriate, in its sole discretion, as permitted by applicable law. Since the hard copy of the Guide shall only be re-distributed periodically, the most current version will always be available under HR <GO>, POLY <GO> or IDOC <GO> on the terminal.

Policy Details

1.0 General Human Resources Policies

1.1 Employee Status

Bloomberg is a large organization with fluctuating workforce needs. Please take the time to acquaint yourself with your employee status in your contract, where applicable and/or as set forth in the supplement specific to your region. If you have questions about your employee status, please contact your Manager or Human Resources.

1.2 Background Checks

In an effort to reduce operational risk, newly hired employees must, subject to applicable law, undergo and pass a background check prior to commencing employment with the Company.

Some circumstances, including hiring and internal transfers into certain sensitive positions, may require increased scrutiny, such as additional background screenings, reference checks, credit checks, or attainment of security clearances, depending on the level of information access afforded to the newly hired or transferred employee with the Company and applicable law.

1.3 Effective Global Working and Flexible Work Arrangements

Bloomberg seeks to support our employees' abilities to manage both their work and personal responsibilities. We recognize that throughout an employee's career a formal flexible working arrangement may be needed, or that on an ad hoc basis, some form of informal flexibility may be necessary. Varying work hours or work location provides an opportunity to ensure that both business objectives and personal needs can be met through creative ways of working.

Bloomberg will consider requests for a formal flexible work arrangement on a case-by-case basis and retains sole discretion in deciding whether such requests will be granted, as permitted by applicable law. In making its decision, Bloomberg will consider a number of factors, including, but not limited to, the impact that a flexible schedule would have on the Company's business, operations, and ability to service its customers; the effect that the request would have on the employee's co-workers; the reason for the request, only if the request is to work from home; whether there are any other reasons for refusing or granting the request; and the impact on the employee if the request is refused. Compensation for part-time work will be commensurate with the role being performed and pro-rated according to time worked. The full flexibility policy and related forms can be found at **HR <GO>** on the terminal.

1.4 Equal Employment Opportunity

Bloomberg is committed to attracting, retaining, developing and promoting the most qualified individuals without regard to race, color, religion or belief, sex, national or ethnic origin, ancestry, age, marital status, sexual orientation, gender identity, genetic predisposition or carrier status, protected veteran status/service, pre-JVA veteran status, physical or mental disability, or

any other classification protected by applicable law. As such, Bloomberg is committed to treating all applicants and employees in a non-discriminatory manner with respect to the terms and conditions of employment.

This policy governs all aspects of employment, including recruitment, selection, job assignment, promotion, lay-off, recall from lay-off, training, education, social and recreation programs, transfer, compensation, discipline, termination, and access to benefits.

Moreover, Bloomberg will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, the pay of another employee or applicant may not be discussed or disclosed unless such employee or applicant provides verbal or written consent, either directly or indirectly, or unless otherwise permitted under applicable law. In addition, employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing or action, (c) consistent with Bloomberg's legal duty to furnish information, or (d) otherwise in accordance with applicable law.

Employees are prohibited from engaging in any type of unlawful discrimination. Anyone who believes that they have been the subject of discrimination should contact their Manager, a Human Resources representative, Ken Cooper, Beth Mazzeo, or Peter Grauer.

1.5 Reasonable Accommodation

In furtherance of its commitment to Equal Employment Opportunity ("EEO"), it is also Bloomberg's policy to provide reasonable accommodation for individuals with disabilities to enable performance of the positions for which they are applying, or in which they are employed, where possible. Employees requesting a reasonable accommodation related to a disability should enter an SDSK ADD ASKH ticket under the sub-category "medical accommodation." Employees who are requesting a reasonable accommodation that is not related to a disability should enter an SDSK ADD ASKH ticket under the sub-category "non-medical accommodations".

Please be aware that employees' requests will result in an interactive process with the Company to determine, in accordance with local law, whether the accommodation requested is reasonable, whether another accommodation may be more appropriate and/or whether the requested accommodation would create a disproportionate or undue hardship for the Company.

1.6 Sexual or Other Unlawful Harassment

1.6.1 Anti-Harassment Policy

Bloomberg is committed to providing employees with a professional working environment that is free from all forms of discrimination and harassment as defined under applicable law ("Discrimination" and "Harassment"). Harassment of, or Discrimination against, an individual or

group on the basis of race, color, religion or belief, sex, national or ethnic origin, ancestry, age, marital status, sexual orientation, gender, gender identity, gender expression, genetic predisposition or carrier status, veteran status, mental and physical disability, medical condition, or other classification protected by law in your region, is prohibited. Harassment includes conduct that denigrates or shows hostility or aversion towards an individual based on a protected classification that (i) adversely affects such individual's employment opportunities or working relationship with the Company, (ii) has the purpose or effect of unreasonably interfering with an individual's work performance, or (iii) creates an intimidating, hostile or offensive working environment.

Harassment may take different forms, and may involve, but is not limited to, visual displays, suggestive or offensive remarks or jokes, slurs or epithets of any kind, gestures, unwelcome sexual advances or demands, propositions, or unwanted physical contact. Whatever form it takes, the Company will not permit any employee to harass or otherwise discriminate against others with whom they have business interactions, including, but not limited to other employees, customers and vendors, or permit any outsider to harass its employees. This is true, not only in the workplace, but in any work-related setting including business trips and business-related social events. All employees must comply with this policy and take appropriate measures to ensure that such conduct does not occur.

1.6.2 Reporting and Investigation

It is the responsibility of every employee to help ensure adherence to the Company's policies forbidding Discrimination and Harassment and compliance within each business unit. In an effort to avoid any misunderstandings and foster open communication in the workplace, employees should, but are not required to, communicate their discomfort to those whom they feel are engaging in inappropriate conduct. Employees who believe they have been subjected to any kind of Discrimination or Harassment, whether or not they have confronted their alleged discriminator or harasser, and employees, especially Managers, who witness or are aware of discrimination or harassment, must immediately notify their Manager (provided the Manager is not the alleged discriminator or harasser) or their Human Resources Relationship Manager, Ken Cooper, Beth Mazzeo, or Peter Grauer. Bloomberg will promptly investigate any complaint, and such investigation will, to the maximum extent feasible, remain confidential, on a strict need-to-know basis. However, investigation of such complaints may require disclosure to the accused individual and to other witnesses in order to gather pertinent facts. At the conclusion of its investigation, the Company will take whatever action, if any, it believes appropriate under the circumstances or to prevent the occurrence of such conduct in the future. In addition, employees are prohibited from making knowingly false reports.

1.6.3 Non-Retaliation

It is unlawful and expressly against Company policy for any person to retaliate against any other person for making in good faith a complaint of Discrimination or Harassment, or for cooperating in an investigation of any allegations of Discrimination or Harassment. Accordingly, individuals who in good faith report incidents of Discrimination or Harassment, or who cooperate in an

investigation regarding any such allegations will not be subject to any form of retaliation. An employee who believes that they have been retaliated against, or who believes that they have witnessed any form of unlawful retaliation, is required to report it immediately to their Manager (provided the Manager is not the alleged retaliator), a Human Resources representative, Ken Cooper, Beth Mazzeo, or Peter Grauer. The reporting and investigation of allegations of retaliation will follow the procedures set forth above for the reporting and investigation of Discrimination and Harassment.

1.7 Communication and Employee Problem Solving

For Bloomberg to succeed, we all must effectively and openly communicate with one another. Since information is only as good as its source, we encourage you to consult your Manager, this Guide, or Human Resources should you have any questions.

Since we recognize that no job or organization is perfect and that problems or misunderstandings may arise from time to time, we are committed to working with our employees to solve our problems and learn from our mistakes. Employees experiencing any problems or complaints regarding the application of Company policies, payment of wages, unlawful Harassment or Discrimination as set forth above, discipline, or other concerns are encouraged to confer with their Manager to resolve such issues. Thereafter, if the issue is not resolved, or if the problem involves their Manager, employees are encouraged to contact a Human Resources representative, Ken Cooper, Beth Mazzeo, or Peter Grauer, without fear of reprisal. The Company wants to listen to and handle your problems internally, but needs your cooperation to make the problem solving procedure work.

1.8 Violence in the Workplace

Bloomberg is committed to maintaining a working environment that is free from all forms of violence, including both physical and verbal offenses. Bloomberg does not tolerate violence or the threat of violence against any employee, client, vendor, visitor or other individual in, or arising out of, the workplace, or through Bloomberg's communication systems. This prohibition also includes statements made in jest, horseplay, or any activity which can be perceived as intended to, or which may potentially result in, physical or psychological harm to any individual or physical damage to Bloomberg property. Employees aware of any threat (expressed or implied) or act of violence must immediately report such conduct to their Manager, Security, or Human Resources.

Bloomberg will promptly investigate any report of any act of violence, and such investigation will, to the maximum extent feasible, remain confidential, on a strict need-to-know basis. However, investigation of such complaints may require disclosure to the accused individual and to other witnesses in order to gather pertinent facts. At the conclusion of its investigation, the Company will take whatever action, if any, it believes appropriate under the circumstances or to prevent the occurrence of such conduct in the future, which may include alerting the appropriate authorities. The Company will not tolerate retaliation against any individual who in good faith reports workplace violence or the threat of violence. Employees are also prohibited from knowingly making false reports.

1.9 Reporting Relationships

While it is not Bloomberg's intent to unreasonably delve into the personal lives of its employees, many problems can arise when employees are involved in personal relationships (including, but not limited to, being related by blood or marriage or having a romantic relationship of any kind) with other employees, Contingent Workers or vendors. Such problems can include but are not limited to conflicts of interest, the appearance of favoritism and/or coercion, exposure to rivalry and discord, work scheduling conflicts, access to otherwise unavailable information, the undermining of the integrity of the Company's operations and difficulties in discipline, and performance assessment. In order to avoid preferential treatment based on familial relationships and the appearance of impropriety, and to maintain appropriate financial controls, the Company generally prohibits the hiring of any relative of current employees, Contingent Workers or vendors (with the exception of individuals who are to be engaged as interns), in accordance with applicable law. For purposes of this policy, "relative" shall be interpreted to include, for both the employee, Contingent Worker or vendor and their spouse, domestic partner or fiancé/fiancée, any of the following relations: grandparents, parents, siblings, children, grandchildren, aunts, uncles, nieces and nephews, and first cousins, and any of their respective spouses, domestic partners or fiancés/ fiancées. Furthermore, any employees involved in a personal relationship with each other or with a Contingent Worker or vendor are prohibited from being in a direct reporting relationship or in the chain of command of one another, or otherwise participating in employment decisions involving one another. Employees must immediately notify Human Resources of any circumstances in which they or other employees may be in violation of this policy. If the Company, in its sole discretion, believes that personal relationships between employees, Contingent Workers or vendors directly or indirectly affect its business, the Company will resolve the situation as it deems necessary, including, but not limited to, re-assignment, transfer, deciding not to hire a candidate and/or termination of employment/engagement.

1.10 Work Authorization

All employees must possess valid work authorization at all times. Every new employee must present such work authorization to Human Resources upon hire and every existing and/or transferring employee must secure the appropriate work authorization upon the expiration of current authorization and upon relocation of their employment.

In some circumstances Bloomberg may cover the costs for the procurement of permanent resident status, although in doing so employees must use the Company's legal counsel. Employees may be asked to sign a permanent resident sponsorship agreement before Bloomberg will proceed with filing and incurring costs for permanent residence applications. For further details, contact Human Resources.

1.11 Internal Job Postings

Bloomberg encourages employees to develop their careers in many ways, including providing opportunities to apply for other positions within the Company. Most open positions will be listed on both www.bloomberg.com and the career portal at **PATH <GO>**.

1.11.1 Employee Eligibility for Internal Mobility

In order to be eligible to apply for or to be considered for an internal role, employees must have a minimum of 18 months of service in their current role and must be in good standing (e.g., must meet or exceed the expectations of their current role, uphold Bloomberg's core values, have no performance concerns, etc.). Exceptions to the 18 months service requirement will be reviewed on a case-by-case basis and may be approved at the business' discretion.

1.11.2 Employee Communication with Manager Policy

Department Managers (direct manager and skip-level manager) will receive a notification when an employee submits a formal application for an open job requisition via PATH<GO>. Informal discussions between an employee and an internal recruiter or hiring manager are encouraged in advance of the formal application to determine the interest level of both parties.

1.11.3 Employee Transition Policy

Employee transfers will take place as soon as 30 days from the time an offer is extended but no longer than 90 days unless other arrangements are agreed upon by the receiving and current Managers.

1.11.4 Relocation and Transfer

Where job opportunities exist outside the employee's current location, Bloomberg will, at its discretion, provide relocation assistance to support employees with their move and transition to the new location. Relocation assistance may vary, based on the reason for the transfer and in line with the needs of the business. In the event the employee leaves the Company within a specified period of time following relocation, the employee may be obligated to pay back a pro-rated portion of the relocation assistance received. Failure to repay the amount due may result in legal action taken by the Company against the employee. Please contact your Human Resources Relationship Manager for any questions regarding relocation assistance.

1.12 Travel and Business Expenses

Bloomberg recognizes that many employees incur travel and business expenses in the course of performing their jobs. Given such, employees will be reimbursed for actual, reasonable and necessary expenditures incurred while travelling and conducting business for the Company, provided that such expenses were incurred in accordance with Bloomberg's policy. For further details, see **EXPT <GO>**, **TNE <GO>** on the terminal, enter an SDSK ADD CIAO ticket, or contact the TNE team.

1.13 Leaving the Company

Employees who resign from the Company should consult their contract, where applicable, for the appropriate notice period. Employees who are at-will are asked to provide their Manager

and/or a Human Resources representative with two weeks' advanced written notice, or with whatever notice may be prescribed by applicable law, of their intended resignation. The Company reserves the right to pay employees during the relevant notice period, so long as they are available to continue working during that time, and terminate their access to the Company's systems and premises. Employees are to complete an exit interview with Human Resources prior to leaving.

Employees who resign (or who give notice of their intention to resign), or whose employment is terminated (or who have been given notice of the termination of their employment), prior to the payout date of their incentive compensation, will not be eligible to receive their incentive compensation, or any portion thereof.

Employees who leave the Company for any reason are required to return all Company property, including, but not limited to, such items as identification cards, resource and information guides, laptop computers, telephones, cellular and mobile devices, beepers, contact lists, software, books, and computer equipment; to remedy all outstanding loans (including repayment of any tuition or relocation expenses that are owed to the Company, per the applicable policy, at the time of employee's resignation), expense reports and credit card bills; and to complete the applicable benefit forms. In addition, no data of any kind, including, but not limited to, Bloomberg intellectual property and Client Data, may be taken or disclosed by employees leaving the Company. Please see the Client Data Classification Policy at **POLY <GO>** for additional information.

Because Bloomberg values the loyalty of its employees, it will not normally rehire employees who leave the Company to work for another company.

2.0 Employee Responsibilities

2.1 General Standards of Conduct and Ethical Behavior

Employees have an obligation to conduct themselves and our business with the highest ethical standards, with integrity, and within guidelines that prohibit actual or potential conflicts of interest or the perception of impropriety. This high degree of ethics imposed upon us applies to everything we do and can have serious implications to and repercussions on Bloomberg's reputation and business dealings. It is imperative that all employees are in compliance with Company standards, policies and procedures relating to conduct, ethics, integrity, objectivity, confidentiality, Client Data, use of inside information and conflicts of interest contained within this Guide and as defined in the Confidentiality Agreement or similar provisions executed at the start of employment or during employment. Much like Bloomberg takes a proactive, thoughtful, and thorough approach to solving client problems, we expect our employees to exercise good judgment and diligence in the handling of sensitive material, including Client Data. Our employees' thoughtful prudence is critical to protecting Bloomberg's and our client's business interests. Any employee who has a question about whether a situation they are in, or may enter into, may violate Bloomberg's standards of conduct should speak to their Manager, a Human Resources representative, Ken Cooper, Beth Mazzeo, or Peter Grauer.

In support of our Standards of Conduct and Ethical Behavior and to maintain Bloomberg's integrity, we provide an anonymous Bloomberg Hotline, which is available 24 hours a day, 7

days a week at +1-212-617-1595 ((801)1595) or +1-800-777-7217 (toll free in the U.S.), for individuals to report misconduct or unethical behavior, or to ask whether a particular situation constitutes misconduct or unethical behavior. All calls are confidential, and employees can choose to make their calls anonymously. Employees have an obligation to report a suspicion or knowledge of misconduct, and failure to do so constitutes a violation of our policy. Bloomberg prohibits retaliation against an employee who in good faith raises a concern or reports suspected or actual misconduct. Issues raised on the hotline will be forwarded to, and addressed by the appropriate individuals within the Company.

Depending on position or department, standards, guidelines and policies other than those set forth below may also apply, and will be either discussed with, or distributed to employees by their Department Manager. In this regard, Bloomberg has promulgated Client Data Principles ("Principles") to inform and guide decisions made throughout Bloomberg by our employees, contractors, and temporary staff about data we collect from our clients and end users through their use of Bloomberg's products and services ("Client Data"). The Principles and related policies can be found at **POLY<GO>**.

The following list outlines general standards of conduct and behavior which is not acceptable at Bloomberg. We expect our employees to avoid the following types of behavior. Because it is not possible to list every type of inappropriate conduct, the following list is not exhaustive nor is it a limitation on Bloomberg's right to discipline or terminate its employees. Therefore, employees should talk to their Managers or Human Resources if unsure of what to do in a given situation. That being said, we expect our employees to exercise good judgment, and should an employee become aware of behavior that appears violative of Company policy or which seems questionable, they must immediately report such conduct to their Manager, Security, or Human Resources:

1. Dishonesty, embezzlement, theft, including, but not limited to theft of information or time, unauthorized removal or possession of property, or conviction of a crime.
2. Fraud or knowing entry of false or misleading information in the Company's books or records, or information systems.
3. Misrepresentation, either verbal or written, or falsification of Company documents including, but not limited to, employment applications.
4. Entering into a contract (including a click-through agreement on a website) on the Company's behalf, or that purports to bind the Company, without the approval of the Legal Department.
5. Immoral, unethical, or indecent conduct.
6. Insubordination, including, but not limited to, refusal to perform work assigned as well as disrespectful conduct toward superiors, co-workers, suppliers, or customers.
7. Unauthorized use, possession, distribution, purchase or sale of, or impairment caused by controlled dangerous substances or alcohol on Company time, in Company facilities, or when acting as a Company employee.
8. Unlawful Discrimination or Harassment against others including, but not limited to, co-workers, subordinates, vendors, contractors, suppliers or customers.
9. Accepting employment with, conducting business for, or providing services to any person or entity other than Bloomberg, even on non-Bloomberg time, without Bloomberg's prior written approval. This prohibition includes, but is not limited to, acting as an employee, independent contractor, self-employed person or agent of any other

company; serving on the board of directors of another company or organization; or engaging in your own commercial endeavor. Any employee wishing to engage in any activity must first submit an SDSK ADD ASKH ticket setting forth in detail the nature of the proposed activity, and detailing why it would not interfere or conflict with the employee's obligations to Bloomberg. Human Resources will provide the employee with written confirmation if their request is approved. Bloomberg reserves the right, in its sole discretion, to deny any such request.

10. Sabotage, loss, or damage to property or merchandise of the Company, clients, co-workers, vendors or contractors.
11. Excessive or otherwise improper personal use of Company equipment, facilities or services, including, but not limited to, electronic or voice mail, the terminal, **IB <GO>**, **MSG <GO>**, **NOTE <GO>**, the Internet, computers (including installing unauthorized software and/or hardware), telephones, laptop computers, copy machines, facsimile machines, cellular and mobile devices, postage or mail services, mainframe access and networks, and communications media.
12. Accessing, or attempting to access, Client Data or any Company information or information contained in Company files or databases without authorization, which includes, but is not limited to accessing such information without having a legitimate business reason for doing so, or soliciting or attempting to induce others to provide Client Data or information, or access to Client Data or information, to which one is not authorized to access.
13. Failure to report any actual or perceived misuse, or inappropriate disclosure of Client Data. For more information, Bloomberg's Client Data Principles and related policies can be found at **POLY <GO>**.
14. Disclosing to the Company, or otherwise using for the Company's benefit, any confidential or proprietary information that an employee may have obtained in connection with employment with any prior employer, without proper consent.
15. Accessing a third-party computer system without authorization from the owner of the system. Employees who received authorization prior to joining Bloomberg must reapply for such authorization and, if asked, disclose their employment by Bloomberg to the owner of that system. Employees who are obtaining authorization for the first time must, if asked, disclose their employment by Bloomberg to the owner of that system. Employees must never access a third-party computer system using log-in credentials issued to someone other than themselves. The term "third-party computer system" includes, without limitation, web portals, websites, applications and cloud services.
16. Improperly attempting to influence editorial decisions in order to further the commercial goals of the Company.
17. Providing a calculated figure ("Index"), which the employee knows or reasonably should know is being used as the basis for a financial instrument (e.g., ETFs, options, swaps, futures contracts, etc.) or to evaluate the performance or asset allocation of an investment fund. For more information, please access Bloomberg's policy on Benchmark Administration on **POLY <GO>**.
18. Failure to project a positive and professional image, including, but not limited to, failing to wear attire appropriate for one's position and engaging in unprofessional conduct.
19. Disparagement of the Company, employees, contractors, vendors, suppliers, competitors or clients.
20. Incompetence, inefficient and/or careless performance of duties, failure to maintain proper work standards, or other poor performance, as determined in the sole discretion of the Company.
21. Excessive or patterned absence or tardiness, or failure to promptly contact Managers regarding absences and tardiness.

22. Possession, use, or distribution of dangerous weapons, such as knives, guns, explosives, or any other devices that jeopardize the safety or security of individuals and/or property on Bloomberg premises.
23. Disrespectful or intimidating conduct of any kind, including, but not limited to, threats, whether expressed, implied, or in jest.
24. Tape recording or video recording, or attempting to tape record or video record, other employees, clients, customers, vendors or third parties without their knowledge or consent, except for Company authorized Telephone Monitoring as described in Section 8 or where otherwise explicitly authorized by Company policy.
25. Failure to comply with applicable country, state, or local tax requirements.
26. Failure to cooperate with the Company in connection with any pending or potential litigation, arbitration, investigation, inquiry or regulatory matter, including but not limited to by meeting with the Company's attorneys.
27. Violation of any other Company or department policy, procedure or rule, including those set forth in this Guide.
28. Involvement in any activities that could be considered to be a bribe or any form of unethical inducement or payment, including facilitation payments or kickbacks.
29. Failure to report any bribe or unorthodox payment or inducement.
30. Failure to immediately report lost or stolen Company property or information. In the event any Company property or information is lost or stolen, employees should immediately notify their Manager who is responsible for escalating as appropriate.

2.2 Conflicts of Interest

Employees must avoid situations where their personal interests or other business interest could conflict with the interests of Bloomberg or could be perceived by others as doing so. Conflicts of interest arise when an individual's position or responsibilities with Bloomberg present an opportunity for personal gain separate and apart from the direct rewards of employment, or when an employee's personal interests or other business interests are inconsistent with those of Bloomberg and could lead to their responsibilities with Bloomberg being compromised.

A conflict of interest, or the appearance of a conflict, may arise in a variety of circumstances and it is not possible to describe every situation. By example, however, a conflict occurs when an employee, relative of an employee, or individual with whom an employee has a personal relationship:

1. Directly or indirectly has a personal or financial interest in any transaction which is, or may be adverse to Bloomberg; or
2. Engages in, or recommends a business transaction for Bloomberg that results in personal profit or gain.

Beyond the clear cases of conflicts of interest described above, there are situations that are inconsistent with the high standards of business ethics required by Bloomberg, which cannot be compromised. If there is room for suspicion that an interest in, or connection with, another venture might affect, or reasonably appear to affect, an employee's exercise of judgment on behalf of Bloomberg, the interest or connection shall not be entered into, and once identified, shall be immediately brought to the employee's Manager's attention. In all situations, employees should observe Bloomberg's Client Data Principles.

2.3 Misuse of Confidential Information and Trading Restrictions

As a condition of employment, upon hire, employees are required to enter into confidentiality provisions or to sign Bloomberg's Confidentiality Agreement. This requirement reflects the fact that Bloomberg employees have access to, and become familiar with, a broad range of highly sensitive confidential and proprietary information concerning Bloomberg and its clients, vendors and counterparties, and other third parties with whom Bloomberg has a relationship. The protection of this information is critically important to Bloomberg's reputation, relationship with its clients, compliance obligations, and continued success. As discussed more fully below, Bloomberg's policies regarding the protection of confidential information, as well as its requirement that its employees act with the highest degree of business ethics and avoid even the appearance of impropriety, necessarily impact the personal investment activities of employees' and their Covered Persons (as defined below), and require that each such person comply with the restrictions on such activities described below and in the Personal Trading Policy. Employees must also comply with the disclosure requirements set forth in the Personal Trading Policy.

Consistent with Bloomberg's strict insistence on the protection of confidential information, Bloomberg employees may not use or disclose, either internally or externally, confidential information obtained or learned about in the course of their employment for any purpose other than in connection to the specific role they perform at Bloomberg. This prohibition includes, but is not limited to, employees' use or disclosure of such information for their own or someone else's personal or financial gain. In addition, employees may not misuse their positions at Bloomberg to impact improperly the financial markets. Thus, Bloomberg employees are prohibited from: (1) disclosing to others (with the exception of people inside the Company with a "need to know") material non-public information (as defined below) about the Company or its clients, vendors, suppliers or third parties with whom Bloomberg has a relationship; (2) trading securities (for the purpose of this section, "security" or "securities" shall mean any negotiable financial instrument that represents a tradable asset, including but not limited to stocks, bonds, debentures, options, equity securities, convertible securities, warrants, derivatives, notes, collective investment schemes, open or closed-end mutual funds, exchange-traded funds and unit investment trusts) while in possession of material, non-public information concerning those securities (or their issuer); (3) buying or selling a security with knowledge of a pending publication or dissemination by Bloomberg of news, research, analysis or other information that could reasonably be expected to have an impact on that security's price; (4) causing Bloomberg to disseminate news, research, analysis, or other information for the purpose of affecting securities prices; or (5) engaging in any other investment activity that could compromise objectivity or give the appearance of impropriety or of taking unfair advantage of one's position at Bloomberg.

Nothing in this confidentiality provision or any other provision in this Guide shall restrict an employee's right to report, in good faith, actual or suspected violations of law to a relevant governmental agency. In addition, and in accordance with the Defense of Trade Secrets Act, an individual shall not be held criminally or civilly liable under any Federal or State trade secret law for the disclosure of a trade secret that is made in confidence to a Federal, State, or local

government official or to an attorney solely for the purpose of reporting or investigating a suspected violation of law. An individual shall not be held criminally or civilly liable under any Federal or State trade secret law for the disclosure of a trade secret that is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal; and does not disclose the trade secret, except pursuant to court order.

To safeguard against the inadvertent sharing of confidential information, including material non-public information, and the potential ramifications of such a disclosure, confidential information shall not be mentioned in discussions in public settings, including within the office. Bloomberg is proud of its open floor plan and open environment, and strongly believes that it facilitates dialogue, collaboration and idea generation amongst employees. Employees need to be mindful, however, that there may be colleagues, visitors and clients who should not be privy to certain discussions in our open environment. Employees, therefore, shall exercise judgment when discussing confidential information in open places such as the pantry, elevators, stairwells and escalators, and even in workspaces where other employees who should not be privy to the conversation could overhear.

Bloomberg has secure internal email and messaging systems, including MSG <GO>, IB <GO> and NOTE<GO>, that should be used by employees as the primary communications media for business purposes. Employees must not maintain, organize, use or otherwise participate in any third party-hosted solution, including but not limited to any Cloud Services, to communicate, distribute or disseminate Client Data, Internal Data or Third Party Data, unless use of the third party-hosted solution for such communication, distribution or dissemination has been expressly approved by the Chief Risk and Compliance Office ("CRCO"). Examples of third party-hosted solutions include, but are not limited to, Google Chat, WhatsApp, weChat, Slack, Scribd, Dropbox and Google Drive. This prohibition includes, but is not limited to, uploading files to third party-hosted solutions and sending or making available documents or other files containing Client Data, Internal Data or Third Party Data to colleagues, clients, or any other third party by way of a third party-hosted solution, without appropriate authorization from CRCO. If authorization is granted, unless expressly stated otherwise, such authorization will be specific to the sharing of certain, specified Client Data, Internal Data or Third Party Data via a particular third party-hosted solution only and must not be taken as authorization to share any Client Data, Internal Data or Third Party Data via any third party-hosted solution. This prohibition also includes the interoperation of third-party applications with an authorized third party-hosted solution, unless such interoperation is also expressly authorized by CRCO, as such interoperation may allow the third-party application to access Client Data, Internal Data or Third Party Data stored on the third party-hosted solution. If any employee has any doubt whatsoever as to whether they have appropriate authorization to upload files to a third party hosted solution or communicate, distribute or disseminate Client Data, Internal Data or Third Party Data via a third party-hosted solution, they shall refrain from such upload, communication, distribution or dissemination and shall promptly enter an SDSK CRCO ticket for review and approval.

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Bloomberg employees are also prohibited from short selling, selling securities for profit within 30 calendar days of purchasing them, or trading any derivative (meaning any security whose price is dependent upon or derived from one or more underlying assets, including options, futures, forwards, swaps, warrants, binary bets, spread bets, and contracts for difference (CFD)) since such activities are widely considered to be susceptible to abuse and can often give rise to the appearance of impropriety. Employees seeking permission to engage in the above activities must receive special and explicit permission. Requests must be submitted by entering an SDSK ticket (keywords: personal trading).

The three prohibitions set forth in the previous paragraph do not apply to any account in which trading decisions and activities are performed by a third party money manager, in which the account owner does not retain discretion to direct or influence the trading of securities in that account. The prohibition against trading derivatives does not apply with respect to writing covered calls, or taking long positions in spread bets or contracts for difference; however, such actions are subject to the other trading restrictions described herein.

In addition, employees who work in or with certain groups, such as Bloomberg Tradebook, BNEF, Bloomberg Intelligence, BVAL, BVAL Derivatives, Bloomberg Indices, Bloomberg Risk & Valuation Group, BDVD, BFIX, BMRK, and News are also subject to other, more restrictive trading restrictions set forth in group-specific policies and/or guidelines, as they may be promulgated or amended from time to time, including, but not limited to:

- Bloomberg Tradebook Compliance Manual
- BNEF Code of Conduct
- Bloomberg Intelligence Code of Conduct
- BDVD Code of Conduct
- Bloomberg Risk and Valuation Group Code of Conduct
- Bloomberg Indices Code of Conduct
- Bloomberg BVAL and BVAL Derivatives Code of Conduct
- BFIX Code of Conduct
- BMRK Code of Conduct
- The Journalistic Code of Conduct
- The Bloomberg Way; or
- Any other Code of Ethics promulgated by a department or business unit

The prohibitions set forth herein apply to employees' trading activities for their own accounts, for accounts in which they have a direct or indirect beneficial interest (including accounts of an employee's spouse, domestic partner or equivalent, minor or dependent children, relative or other individual who is financially dependent on an employee (each, a "Covered Person") and for any other accounts over which they have discretionary authority or power of attorney.

For purposes of the prohibitions set forth above, "material non-public information" means any information that (a) is not generally available to the investing public, and (b) would be considered important by a reasonable person in deciding whether to buy or sell a particular security.

Employees shall also be cognizant that their investment activities are also circumscribed by legal prohibitions on, among other things, the misuse of non-public information and on market manipulation. In that regard, the laws in many jurisdictions prohibit buying or selling securities based on non-public information or under various circumstances, providing non-public information to another person for that person's use in buying or selling securities (sometimes known as "tipping"). Thus, engaging in transactions based on non-public information or "tipping" may not only violate Bloomberg policy but also subject the wrongdoer to severe criminal and civil sanctions. Furthermore, any such violation by any employee of the Company could seriously damage the Company's reputation and expose it to both embarrassment and legal claims. Consequently, employees must take care to ensure that their investment activities comply not only with Bloomberg policies, but also with the various legal prohibitions to which they may be subject.

When employees have any doubt whatsoever as to whether information in their possession is "material non-public information," they shall (i) treat the information as "material non-public information," (ii) refrain from trading in the security to which such information relates, (iii) refrain from disclosing the information further, and (iv) promptly enter an SDSK ticket (keywords: personal trading) to seek clarification.

2.4 Gifts

No employee or member of their family may, directly or indirectly, receive bonuses, fees, gifts, entertainment or sports tickets, or any other item that is of more than nominal value from any entity or person with whom Bloomberg does, or would like to do, business. An exception may be made for items that are only of token value. Upon receiving gifts, employees must contact Human Resources for guidance, and the Company reserves the right to dispose of such gifts as it deems appropriate. Bloomberg employees also may not offer gifts, money or entertainment to vendors or customers with whom they do, or would like to do, business without management consent.

2.5 Social Media Activities

Use of social media has reached an all-time high, and Bloomberg recognizes the positive impact that this means of communication can have on our business. Bloomberg recognizes that many employees engage in social media for personal use, and have represented our Company positively by mentioning our brands, products, news, and events.

The Social Media Policy, which can be found on **POLY<GO>**, sets forth the responsibilities of our employees when engaging in social media and also provides a list of prohibited subjects. The intent of the Social Media policy is not to restrict the flow of useful and appropriate information, but to minimize risk to the Company and its employees. Although the policy defines social media and its appropriate use, the standards outlined in the policy are meant to apply to new tools and technologies as they come into use in this rapidly-evolving field. Employees must adhere to the policy when engaging in social media activities.

2.6 Personal Data and Information

At various times during their employment, employees will be required to, or choose to, provide the Company with (or the Company may collect) certain Personal Data and Information. The Company uses Personal Data and Information for purposes of the employment relationship, for administration and management purposes and related analyses, for safety or security purposes, for business purposes, and to ensure compliance with Company policies and applicable laws and regulations. Personal Data and Information may include work authorization forms, address and contact information, dates of birth, emergency contact information, identification documents (e.g., driver's license, social security numbers, ID numbers), financial account information (e.g., compensation and banking information), information regarding education and employment history, medical/health information, data collected by Closed Circuit Television (CCTV) camera systems, location data (including as collected by a security badge system, company-issued devices and/or personal portable or mobile devices used for business purposes), and any other personal or sensitive personal data, including, but not limited to, EEO information, information in connection with background checks and concerning a prior criminal record (where applicable), and any other information required by law or requested by Human Resources or the Company.

In certain instances, included where required by law, we will only process Personal Data and Information with your consent. Where that is the case, you have the right to withdraw that consent at any time. Your country-specific supplement may have further information in this regard.

In addition, as a condition of employment, employees' personal telephone numbers will be made available so that other Bloomberg employees and certain vendors of the Company (e.g., advisors or consultants) may contact them outside the office, if necessary, for business-related reasons. Similarly, employees' pictures will be made available for identification purposes. CCTV footage will also be recorded and reviewed by the Company's Security Operations team and/or guard force for safety and security purposes.

Bloomberg will ensure that appropriate security measures are taken to prevent unlawful or unauthorized processing of Personal Data and Information and against the accidental loss of or damage to Personal Data and Information. Human Resources will hold, retain and destroy all Personal Data and Information in accordance with the policies of the Human Resources department and applicable law. Employees must provide the Company with accurate Personal Data and Information and must notify Human Resources of any changes to their Personal Data and Information so that the Company can maintain accurate records, and may request access to their Personal Data and Information to ensure that it is correct and complete. Employees are also encouraged to forward all documents and materials containing Personal Data and Information, including without limitation all evaluations, compensation and performance-related materials (whether they relate to the employee forwarding the materials or to other employees) to Human Resources for storage in accordance with Company policies. Managers and other supervisory employees outside of Human Resources should not maintain any such documents or materials for their own records.

The Company may share employees' Personal Data and Information under the following circumstances:

1. With, between or among its offices, affiliates, subsidiaries and any successor entity;
2. With third parties who provide services to the Company such as benefit and payroll providers, analysis providers, consultants, administrators, legal and other advisors, tax consultants and security contractors;
3. In response to a subpoena, as part of a court order or tribunal process, government investigation, government request, or other legal or regulatory process; and
4. As is necessary to protect the rights, property, interests, safety, or reputation of the Company, its clients or others.

Personal Data and Information may be shared with and/or transferred to offices or third parties, for the purposes mentioned above, located outside the country in which the employee is based, including to the United States, which may have different levels of privacy protection than the employee's country.

Your Personal Data and Information will be stored for a period consistent with our legal obligations and record retention policies.

Employees are prohibited from using employees' Personal Data and Information for non-business reasons.

If you have questions regarding the Company's use of your Personal Data and Information, please enter an SDSK ADD ASKH ticket.

2.7 Announcements, References, and Other Requests for Information

In accordance with their obligation to keep Company confidences, employees are required to refer all requests or inquiries from outside of the Company to the appropriate Company representative. Any inquiry from a government official, newspaper, magazine, blogger, broadcast media, book publisher, photographer, film producer or any other person seeking to publish information concerning the Company must be referred to the Public Relations department. This includes solicitations for information or inquiries about the Company from participants in social media, as well as requests to use the Company name or logo in advertisements, Web sites, publications and press releases. Employees may not make or confirm statements on behalf of, or concerning, the Company to the press or on social media (blogs, Web sites, social networks, and Twitter and LinkedIn) without prior approval from the Public Relations department.

It is Bloomberg's policy to only verify former and current employees' position, current or final salary and dates of employment. In most regions, employees can access their own employment verification letter under the Personal Information section on **MYPD <GO>**. In regions where this is not available, employees should contact their Human Resources Relationship Manager for assistance. No employee may give former or current employees or Contingent Workers a personal reference for employment or other purposes, unless required by local law, in which case the employee should contact Human Resources for guidance. Employees may submit a request to their Manager for a reference for entry into a school program and/or condominium/co-

operative acceptance purposes if they have acceptable performance in their current job, as permitted by applicable law. Employees and their Managers must bring such requests to the attention of Human Resources, and their Managers and Human Resources will review such requests on a case-by-case basis to determine whether a reference will be given. Violations of this policy may result in further action, up to and including termination of employment.

2.8 Access, Solicitation, and Distribution

2.8.1 Access

Persons not employed by Bloomberg are not allowed to access Bloomberg property for any purpose unless they secure advance permission and comply with Bloomberg's access and security procedures. Persons not employed by Bloomberg are not permitted to distribute literature or solicit employees on Company property for any purpose, at any time, nor may they post solicitation notices in Bloomberg's offices or on the terminal.

2.8.2 Solicitation

Employees are not permitted to solicit other employees for any purpose during the working time of either the soliciting employee or the solicited employee. "Solicitation" includes asking for support, assistance or contributions for, soliciting memberships in, or selling goods for any outside business, charitable (including charity races, runs and walks), religious, civic or other organization. "Working time" does not include lunch breaks, break times, or other periods when employees are not required to be working for Bloomberg.

2.8.3 Distribution

Employees are generally not permitted to distribute literature in work areas at any time. "Literature" includes written materials such as fliers, letters, brochures, memoranda and pamphlets of any kind or for any purpose. "Working areas" include all locations on Bloomberg premises where employees perform work, but do not include non-work areas like lunch rooms.

Bloomberg may permit limited exceptions to its policy governing Solicitation and Distribution for certain Company-sponsored charitable events from time to time or as required by applicable law.

2.8.4 Bulletin Boards

Bloomberg maintains official bulletin boards (whether physical or electronic) to communicate important Company-related information and mandatory legal notices. Only Human Resources or other persons designated by Bloomberg may post material on, or remove material from, official bulletin boards. Official bulletin boards are not to be used for personal, charitable, civic, political or other non-business notices, solicitations or materials. Employees may post personal or other non-business materials only on non-official bulletin boards designated for employee use. Bloomberg may remove any materials that violate company policies, including policies against harassment and discrimination.

2.9 Hosting Personal Guests

When employees invite personal guests to Bloomberg, it is their responsibility to ensure their personal guests comply with Bloomberg policies during their visits and leave the building when their visits are over. While Bloomberg is happy to have employees show its offices to friends and family, employees should not conduct personal meetings in Bloomberg offices. Especially with a shortage of conference room space, personal meetings should be conducted outside the building.

2.10 Hosting External Events at Bloomberg

Bloomberg generously opens its office space for business-related tours and meetings. Generally, our offices are used only for customers, internal business or to support approved philanthropic relationships. With conference and meeting space at a premium, employees are not permitted to host meetings or tours for external organizations at Bloomberg. Business-related events may be held at the discretion of the Department Manager; related expenses must be covered by that business group.

2.11 Substance Abuse and Testing

Bloomberg has a vital interest in providing safe and healthy working conditions for its employees as well as its vendors and clients. Bloomberg, therefore, is committed to maintaining a workplace free from the influence of drugs and alcohol and at the same time is committed to assisting in the rehabilitation of those employees who voluntarily request assistance.

In furtherance of this policy, employees who use, possess, store, distribute, purchase, manufacture or who are under the influence of illegal or non-prescribed drugs or alcohol while working or otherwise on Bloomberg's premises or vehicles are subject to immediate termination, as permitted by applicable law. Bloomberg reserves the right to, and may, in its sole discretion, require an employee to undergo drug or alcohol screening where it reasonably suspects the employee to be under the influence of illegal or non-prescribed drugs or alcohol while working or otherwise on Bloomberg's premises or vehicles, as permitted by applicable law. Any employee refusing to cooperate in such testing as required may be subject to discipline, up to and including termination of employment.

Employees who test positive for illegal or non-prescribed drugs or alcohol, or who are otherwise determined to have violated this policy, may, depending on the circumstances and in the sole discretion of Bloomberg, be terminated or permitted to undergo rehabilitation, counseling and/or treatment. If after such treatment, satisfactory evidence of rehabilitation is presented, Bloomberg, in its sole discretion, may return the employee to work, subject to periodic random testing for a period of time deemed appropriate by Bloomberg or as may be required by applicable law. If the employee refuses to follow the recommended rehabilitation, counseling, treatment and/or after-care program or refuses to be subject to follow-up testing or tests positive in any subsequent test or otherwise violates this policy, the employee may be subject to immediate termination of employment, as permitted by applicable law.

Employees with drug and/or alcohol problems are encouraged to come forward and voluntarily seek help. Prior to conduct leading to a request to submit to a drug/alcohol screen an employee may request to participate in an approved rehabilitation, counseling and/or treatment program. Bloomberg, in its sole discretion, or as required by law, may grant such employee a leave of absence or time off to attend such program(s). Following the completion of such program(s), the employee may be periodically tested on a random basis for a period of time deemed appropriate by Bloomberg or as may be required by applicable law. If the employee refuses to follow the recommended treatment program and/or after-care program or refuses to be subject to follow-up testing or tests positive in any subsequent test or otherwise violates this policy, the employee may be subject to immediate termination of employment, as permitted by applicable law.

Testing information and results under this policy will not be disclosed to anyone at Bloomberg who does not have a legitimate need to know.

2.12 No Smoking

All Bloomberg employees must work together to maintain the highest possible level of safety and mutual comfort. Accordingly, smoking, including the use of electronic cigarettes, is not permitted in Bloomberg facilities, including Company vehicles, outdoor office space, or within close proximity of the entrances to our facilities.

This policy applies equally to all employees, vendors, clients, and visitors.

No retaliatory adverse personnel action will be taken with respect to any employee for lodging complaints or concerns regarding compliance with this policy. Any employee or applicant who believes they have suffered any such retaliatory action should contact Human Resources.

2.13 Political Contributions

In the context of conducting Bloomberg business, no employee shall apply any pressure or make any suggestion or threat, direct or implied, that failure to make a political contribution or participate in political activity will result in some disadvantage, or that making a contribution may result in some advantage, nor may any person provide, or withhold any benefit, inducement or reward, concerning Bloomberg's business, to another employee, consultant, vendor or client in an effort to influence that person's decision to support a political candidate or party.

2.14 Use of Mobile Communications, Texting, and Hand-Held Devices While Driving

Cellular telephone conversations, the use of hand-held devices and other similar distractions are to be avoided while driving. While the Company supports the use of cellular telephones and hand-held devices for business purposes, we prohibit employees from using cellular telephones or hand-held devices to conduct business while driving. If an employee needs to make or take a business call or send or view a text message or e-mail, while driving, the employee shall pull off the road and stop in a safe location, if practicable, prior to using the cellular telephone or hand-held device. In addition, the Company expects that all employees comply with applicable laws regarding the use of cellular telephones and hand-held devices while operating a motor vehicle.

3.0 Intellectual Property

Bloomberg is committed to robust and fair competition. Consequently, Bloomberg requires all of its employees to sign a Confidentiality Agreement or similar provisions to help protect its intellectual property and respect the intellectual property rights of others. Employees may not misuse the confidential or proprietary information or trade secrets of the Company or of a third party, regardless of how they discover this information. Employees must not use third party copyrighted material without the authority of the owner, unless the Company's lawyers have advised that this use is lawful. In addition, employees must not consciously misuse the Company's or a third party's trademarks or service marks or seek to appropriate the goodwill associated with such marks. Violations of this policy may result in further action, up to and including termination of employment.

4.0 Bribery and Corruption

Bloomberg values its reputation for ethical behavior and has a zero tolerance commitment against bribery and corruption in any form in any jurisdiction in which Bloomberg operates. Full details of Bloomberg's policy on bribery and corruption, which all employees are required to adhere to, is set out at **HR ANTI-CORRUPTION <GO>**.

5.0 Anti-Slavery

Bloomberg values its reputation for ethical behavior and has a zero tolerance approach to modern slavery in any form.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in our supply chains.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for Bloomberg or under our control. Employees are required to avoid any activity that might lead to, or suggest a breach of this policy.

Employees must notify their Manager, HR or the anonymous helpline as soon as possible if they believe or suspect that a breach or conflict with this policy has occurred, or may occur in the future. If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their Manager or HR or through the anonymous Bloomberg Hotline, which is available 24 hours a day, 7 days a week at +1-212-617-1595 ((801)1595) or +1-800-777-7217 (toll free in the U.S.).

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting any such suspicions.

Any employee who breaches this policy may face disciplinary action up to and including termination.

6.0 Absences, Time Off, and Holidays

6.1 Absences and Tardiness

Employees are expected to be at work and to report on time. If they expect to be late, employees must promptly contact their Manager to state the reason for such lateness and when they expect to arrive at work. Employees who are unable to report to work due to illness, injury or any other reason must notify their Manager and provide the reason for their absence at least one hour before their normal starting time. Further conditions may apply in your region. Employees should consult their contract, where applicable, or Human Resources for more information.

6.2 Paid Time Off/Holidays/Leaves

Since employees generally need time off for various reasons including rest, relaxation, handling personal matters, and religious observances, Bloomberg may provide employees with paid time off. In addition, employees may be entitled to holidays and additional leaves, per applicable laws. Employees should consult their contracts, where applicable, or speak to their Manager or Human Resources to determine their time off, holiday, and leave entitlement.

6.3 Jury Duty/Civic Duty Leave

Bloomberg encourages its employees to fulfill their civic responsibilities by granting time off to serve jury duty/civic duty leave. Where applicable, Bloomberg may pay employees their full salary while on such leave.

Before such leave will be granted, employees must submit a copy of their jury notice or other acceptable documentation to their Manager as soon as they receive it. Employees who are not required to serve as a juror on a scheduled work day, or who are released prior to the end of the regular workday, must return to work. To be paid for such leave, proof of actual jury service or other acceptable proof must be presented to Human Resources upon return to work.

7.0 Security, Facilities, and Equipment

7.1 Company Equipment

In order to assist employees in performing their jobs, Bloomberg provides certain equipment and materials including, but not limited to, electronic mail, voice mail, telephones, Internet, postage, copy and fax machines, personal computers, laptop computers, cellular and mobile devices, other hardware/software, mobile applications, wireless and wired networks, and

communications media (collectively, “Company Equipment”). Such Company Equipment and all files and data stored on Company Equipment are and shall remain the property of Bloomberg at all times. For purposes of recruitment and the employment relationship; administration and management; safety or security; business purposes; managing and assessing compliance with Company policies and applicable laws and regulations; investigating and taking disciplinary action relating to violations of such policies, laws and regulations; responding to subpoenas, court orders and government information requests; and to maintain the safety and security of employees, Contingent Workers, customers, vendors, visitors, data and facilities, the Company reserves the right to access, collect, inspect, review, monitor, decrypt, delete, copy, remove, change, transfer, record, store, block, disclose (including within Bloomberg and its subsidiaries and affiliates, and to third parties), and otherwise process (collectively, “Access and Process”) the data and contents of such Company Equipment, including Bloomberg’s system usage information, or of any communications (including personal communications, to the extent permitted under this Section) made using Company Equipment, at any time and without further notice, by any means.

Company Equipment is made available to employees for use in connection with the Company's business. Accordingly, employees should not expect privacy in their communications (including personal communications) made using Company Equipment. All equipment and software installed on Company Equipment and/or used to access Bloomberg information assets must be approved by the Company and installed by a PC support representative. This includes, but is not limited to, all software packages and mobile applications (including those placed on personal devices for business purposes), hardware, keyboards, mice, USB keys, and cameras. Employees are responsible for the safekeeping of the Company Equipment in their possession. Unauthorized use, abuse, loss, destruction or personal use of Company Equipment is strictly prohibited. Personal Data and Information may be acquired by or as a result of use of Company Equipment, including in connection with employees’ communications made using such Company Equipment, and such Personal Data and Information shall be treated in accordance with this policy.

Employees may be required to sign a receipt confirming that they have received specific Company Equipment. Upon request and/or separation from the Company, all Company Equipment must be returned immediately to Bloomberg, and all software and/or mobile applications must be deleted.

To the extent you use your own personal equipment and/or software to access the Company's wireless and wired networks or any other Company communication or computer systems, these guidelines apply to such equipment and/or software as well.

7.2 Use of Software and Electronic Communications

In addition to the above, the following guidelines, which are not all-inclusive, have been established to ensure that employees understand the Company's expectations with regard to the use of software, the Internet, **IB<GO>**, **NOTE<GO>**, **MSG<GO>** and other email systems, as well as any other means of electronic communication, provided by Bloomberg (collectively,

“Company Communications Systems”). Bloomberg may in its discretion block access to certain types of websites, including due to malicious and/or inappropriate content.

For purposes including recruitment and the employment relationship; administration and management; safety and security, business purposes; managing and assessing compliance with Company policies and applicable laws and regulations; investigating and taking disciplinary action relating to violations of such policies, laws and regulations; responding to subpoenas, court orders and government information requests; and to maintain the safety and security of employees, Contingent Workers, customers, vendors, visitors, data and facilities, Bloomberg reserves the right to Access and Process information relating to employees' use of Company Communications Systems.

In this regard, employees should be aware that Bloomberg may exercise any or all of these rights at any time and without further notice, including with respect to communications made using Company Equipment or Company Communications Systems (including personal communications, whether made through the terminal, the Internet, **IB<GO>**, **MSG<GO>**, **NOTE<GO>**, and other email systems or other means).

In addition, information relating to employees' use of Company Equipment and Company Communications Systems, including communications, may be retained for as long as necessary by the Company for these purposes, and transferred to countries other than the country in which the employee is based, including to the United States, which may have different levels of privacy protections.

Employees should also be aware that use of the Internet (including email, social media, and blogging websites like Gmail, AOL, Hotmail, Yahoo, Facebook, MySpace and Twitter or other websites through which personal information may be communicated), leaves trace data and information on Company Communications Systems and Company Equipment, and such trace data may be subject to Access and Processing for the purposes described in this Section.

Bloomberg reserves the right to modify its processes with respect to Access and Processing of information relating to employees' use of Company Communications Systems and Company Equipment in accordance with this Section, and may use Bloomberg proprietary or third party programs, software, appliances, and hardware in connection with these processes.

Employees shall also be aware of and comply with the following:

- Company Equipment and Communications Systems, including Internet access are made available to employees for use in connection with the Company's business. Limited personal use is acceptable on the condition that it otherwise complies with Bloomberg policies and does not interfere with the performance of the employee's job, and that the employee consents to Bloomberg's right to Access and Process such communications as described in this Section. Otherwise, personal use of Bloomberg Company Equipment and Communications Systems is not permitted. In addition, employees are not to engage in any discussion which may create potential conflicts of interest or the appearance of impropriety. Employees shall not "hack" or otherwise obtain unauthorized access or exceed authorized access into Company Equipment,

Communications Systems or any other network or computer system whether owned or operated by the Company or a third party.

- In order to protect the security of Company Equipment and Company Communications Systems, downloading or uploading of any programs, data, or other material, unless expressly approved by management, is strictly prohibited. Not only is the Company concerned about inappropriate materials and copyright infringement, but also special care is especially needed to protect against the spread of viruses. Employees who have a legitimate business need to upload or download any material are expected to exercise good judgment, and if they have any questions about the safety, security or appropriateness of their actions with respect to the material at issue, they shall escalate to the Chief Risk and Compliance Office (“CRCO”) by entering an SDSK CRCO ticket for review and approval.
- The Company vigorously protects its confidential and proprietary information, and absolutely prohibits the unauthorized use, disclosure, reproduction and/or distribution of its property. Since confidentiality and the security of data cannot be assured when using the Internet or email, including but not limited to third party email (e.g., Yahoo!, Gmail, Hotmail, mail.163, me.com) or cloud storage services (e.g., iCloud, Google Docs, Dropbox, or Amazon Cloud), transmission of confidential or proprietary information via these means, even if only temporary, is prohibited, and any such transmissions may be Accessed and Processed for the purposes set forth herein. If employees feel there is a legitimate business need to utilize any such third party services, they shall request an exception by submitting an SDSK CRCO ticket for review and approval.
- The Company's Anti-Harassment policy applies fully to the use of all Company Communications Systems and Company Equipment, including, but not limited to, Internet, **MSG <GO>**, **IB <GO>**, **NOTE <GO>** and email. Accordingly, acquisition and/or dissemination of inappropriate materials, including, but not limited to those which contain sexual innuendo, pornographic material, improper jokes, harassing or threatening statements, or any statement which could be negatively perceived by others or considered hostile or offensive based on any protected classification, including, but not limited to sex, race, color, age, religion or belief, ancestry, marital status, national or ethnic origin, sexual orientation, gender identity, genetic predisposition or carrier status, physical or mental disability, protected veteran status/service, or pre-JVA veteran status is strictly prohibited.
- No abusive, profane, or offensive language or defamatory statements are to be transmitted through Company Communications Systems or Company Equipment. Attempts to circumvent Company safeguards in this regard are also prohibited.
- Each employee must pay attention to the risk of phishing attacks transmitted through Company Communications Systems or Company Equipment. Phishing is a form of fraud in which the attacker tries to steal valuable information by masquerading, in an email or otherwise, as a reputable entity or person. Employees must carefully assess the credibility of each email received before opening attachments, clicking links or providing credentials. If an email looks suspicious, employees should immediately report the email to the CRCO and

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then delete it. Failure to properly report and/or delete suspicious emails could result in disciplinary action, up to and including termination of employment.

- The use of Company Communications Systems or Company Equipment to solicit non-Company business or otherwise for personal gain is strictly prohibited.
- Employees shall not share their passwords or review other employees' or Contingent Workers' files without permission.
- Visiting any game or entertainment sites (e.g., online gambling sites, music download sites, video-streaming sites, sexually explicit sites, social networking sites, personal blogs, etc.) for non-business reasons using Company Communications Systems or Company Equipment is prohibited.
- Unless job related and approved by management, the sending of "chain letters" or "broadcast" messages to lists of individuals using Company Communications Systems or Company Equipment, or the use of Company Communications Systems or Company Equipment in a way that may cause congestion of the network, is prohibited.
- All messages transmitted on the Internet and via email using Company Communications Systems or Company Equipment shall have your name attached and no messages shall be transmitted under an assumed name.
- Employees shall be aware that emails, as well as all other communications made using Company Communications Systems or Company Equipment, are Company records and can be used as evidence in a court of law or for any dispute, subject to applicable laws. As described in more detail in **POLY <GO>**, Bloomberg retains copies of all emails and other electronic communications transmitted over its Company Communications Systems and Company Equipment and reserves the right to disclose the contents of such communications to third parties. Also, employees must exercise good judgment in choosing their personal **MSG9** greeting comments. The Company reserves the right to remove MSG9 greetings with or without notice where such greetings are deemed inappropriate in the sole discretion of the Company.
- Employees must comply with policies requiring particular means of authentication to access the terminal and other Company Equipment or Company Communications Systems.
- Employees shall not use Company Equipment and Company Communications Systems to conduct or facilitate any unlawful activities.
- Employees shall not use Company Equipment and/or Company Communications Systems in any way that could be damaging to Bloomberg's public image; is for purposes contrary to the interests of the Company; or is abusive, offensive, defamatory, obscene, or indecent, or of such a nature as to bring the Company or employees into disrepute.
- Employees shall not use Company Equipment and Company Communications Systems in a manner that will disrupt the intended use of system or network

resources and such use shall be appropriate for the task. Employees shall avoid excessive, unnecessary consumption of computing resources for either business or personal use.

- Any business applications developed by employees shall be supportable and maintainable and not degrade the existing IT infrastructure.
- Employees are expected to exercise strong security practices when connecting to the Company's wireless networks using Company-issued or personally-owned devices not issued by the Company. Bloomberg does not maintain firewall software on personal devices. Employees, therefore, using personally-owned devices not issued by the Company should install personal firewall software where appropriate, and keep updated personal firewall software, anti-virus, and anti-malware software.

7.3 Telephone Monitoring

In order to ensure compliance with Company policies and applicable laws and regulations, to maintain the safety and security of employees, customers, vendors, visitors, data, and facilities, and for legitimate business purposes Bloomberg reserves the right, whether on its own or through its third-party security contractors to monitor all telephone conversations of its employees (including voicemail messages left for or by such employees) using Company Communications Systems, at any time with or without notice, and in accordance with applicable laws and regulations.

7.4 Closed Circuit Television (CCTV) Systems

In accordance with applicable laws, CCTV cameras are installed in some Company offices for safety and security purposes. Where CCTV cameras are installed, Bloomberg provides notice to employees and visitors. Footage is accessed and reviewed by Bloomberg's Security Operations team and/or its third-party security vendors, and retention periods for the footage vary in accordance with local laws and regulations. CCTV footage may be shared with and/or transferred to the Company offices or guard force; such sharing may include transfers of personal data to countries other than the country in which the employee is based, including to the United States, which may have different levels of privacy protections.

7.5 Protection of Published Materials

Bloomberg subscribes to newspapers, journals, magazines, newsletters, and other services in order to access business information. It is our policy to protect the rights of the publishers and/or authors of such media by paying for all subscriptions, unless they are provided free of charge. Moreover, employees may not copy, fax, print, or redistribute this information except as legally permitted by the publisher and/or author, whoever has rights to distribution.

7.6 Personal Property

Bloomberg does not assume responsibility or reimburse employees or others for the loss, theft, or destruction of any personal property that is brought onto Company premises. Employees are urged to exercise care in regard to leaving their personal belongings on Company premises.

7.7 Property Inspection

Bloomberg and our security representatives reserve the right to inspect all storage areas, lockers, desks, briefcases, handbags, electronic equipment and other personal property brought onto or removed from the premises at any time, subject to applicable law. Employees must cooperate in such inspections should they occur.

Bloomberg does not accept the delivery of personal mail at any of our premises, unless otherwise pre-approved by the Company.

7.8 Security

Bloomberg's premises contain valuable equipment, furnishings, and merchandise. It is extremely important, in order to protect the safety of everyone, that all employees pay close attention to the security of our facility. Please notify Security and/or Human Resources immediately if you see anyone or anything suspicious. Employees must wear their identification badges (with their picture showing) in the office at all times, and swipe their badges upon entering and leaving Bloomberg premises.

7.9 Health and Safety

Bloomberg promotes maintaining a safe and healthy environment at the workplace. Employees shall make themselves familiar with Bloomberg's fire, medical and security procedures found on **EMER<GO>** to ensure that they know what to do in the event of an emergency.

8.0 Employee Services

8.1 Employee Assistance Program

Today's lifestyles are increasingly hectic. All of us, regardless of our backgrounds or jobs, face a variety of difficulties in our daily lives. Most often, we are able to work situations out by ourselves. However, at times, many people may face problems that are too complex or overwhelming to handle alone.

While it is not Bloomberg's intention to become involved in the personal lives of its employees, Bloomberg recognizes the importance of providing constructive professional assistance to help employees and their families work through difficult problems, put such problems in perspective, and find reasonable solutions. Accordingly, Bloomberg offers an Employee Assistance Program (EAP) for its employees.

The EAP is a confidential program, available to all Bloomberg employees and their families, which provides individuals with an opportunity to discuss and resolve their difficulties with the assistance of experienced, licensed, and certified mental health professionals.

Please contact Human Resources or see **EAP<GO>** for more details on this program.

8.2 Out of Office System

All employees must use the **OUT<GO>** function on the terminal. Such function allows employees to record their approved days out of the office and serves as an attendance record. In addition, the OUT function is linked to employees' **FON<GO>** records and comments on **MSG<GO>**. This function is beneficial to use, as it enables us to better serve our clients. Employees must receive approval from their Managers prior to scheduling absences in **OUT<GO>**.

9.0 Employee Benefits

Bloomberg provides comprehensive and generous benefits to our employees globally. Please see **HR<GO>**, consult your contract, where applicable, or speak to Human Resources for details on the range of benefits offered by Bloomberg.

Appendix A: Employee Acknowledgement

I acknowledge that I have received a copy of the Global Resource and Information Core Guide (“Guide”) for Bloomberg L.P. and its subsidiaries and affiliates (referred to herein as “Bloomberg” or the “Company”). I also acknowledge that the terms of this Guide may be supplemented by any applicable laws, as well as by my contract of employment and/or offer letter. I hereby acknowledge that I have read the Guide and will abide by its contents as a condition of my employment. If there is anything that I do not understand or have a question about, I will contact my Manager or Human Resources. I understand that Bloomberg reserves the right to alter, amend or terminate, in whole or in part, any of the policies described in this Guide, or to modify or deviate from them, at any time without notice, and in Bloomberg’s sole discretion, as permitted by applicable law, and that the most up-to-date Guide is available under HR<GO>, POLY<GO> or IDOC<GO> on the terminal. I understand that this Guide is neither an employment contract nor an agreement guaranteeing employment and/or the provision of benefits for any specified period of time and that, absent an executed employment contract that says otherwise, either I or Bloomberg can terminate the at-will employment relationship at any time, for any reason.

By signing below, I further acknowledge that I have carefully read the provision titled “Personal Data and Information” (Section 2.6) and “Security, Facilities, and Equipment” (Section 7.0). I specifically acknowledge that Bloomberg may collect, process, use, store and disclose my Personal Data and Information, both electronically and in secure personnel files, as described in the Guide, and to use manual and/or automated processes to access, collect, inspect, review, monitor, decrypt, delete, copy, remove, change, transfer, record, store, block, disclose (including within Bloomberg and its subsidiaries and affiliates, and to third parties), and otherwise process my communications made using Company Equipment or Company Communications Systems, at any time and without notice, as permitted by applicable laws.

I also acknowledge that Bloomberg may transfer my Personal Data and Information and/or my communications to Bloomberg offices or third parties located outside the country in which I am based, including to the United States, and/or to other countries that may have different levels of privacy protection than my country for the purposes set out in this Guide.

Signature

(Please Print Name)

Date

Office

Appendix B: Contact Information

Human Resources General Numbers

Americas	+1-212-617-0564
Europe/Middle East/Africa	+44-20-3525-9700
Asia Pacific	+81-3-3201-6916
Payroll	+1-212-617-2530 +44-20-7073-3517
Anonymous Hotline	+1-212-617-1595 +1-800-777-7217 (U.S.)

Human Resources

Ken Cooper – Worldwide	+1-212-617-2150
Kate Wheatley – Americas	+1-212-617-1562
Patricia Pierotti – Europe/Middle East/Africa	+44-20-7330-7599
Melanie Coate – Asia Pacific	+852-2293-1971

Additional Resource

Peter Grauer	+1-212-617-1956
Beth Mazzeo	+1-212-617-6175

Appendix C: Key Definitions

B-Unit: the Bloomberg Authentication Unit is used by Bloomberg Personnel or end users to access the Bloomberg Professional service. Each B-Unit is a mobile card that the user keeps in his or her possession, and is configured to authenticate a binary number that has been created based on limited information from the specific person's finger image.

BAR: the Business Administrator for Roles is responsible for role engineering and communicating any Department access control changes to the CRCO.

BIA: the Business Impact Assessment of critical business functions and critical processes that must be recovered. The BIA identifies the potential quantitative and qualitative impacts of uncontrolled, non-specific events to each Department, site, and system, and establishes recovery time objectives (i.e., estimated maximum allowable downtime), recovery point objectives (i.e., acceptable level of losses), and the critical recovery path.

Bloomberg or the Company: Bloomberg Inc., Bloomberg L.P., and any majority-owned or controlled subsidiaries or affiliates.

Bloomberg Hotline: +1-212-617-1595 ((801)1595) or +1-800-777-7217 (toll free in the U.S.).

Bribery: a form of Corruption, and a specific offense which is the activity or practice of offering, giving, or promising to give something in order to gain or obtain an advantage of any kind. Receiving a bribe is also an offense.

BSAT: the Bloomberg Secure Authentication Technology is used by Bloomberg Personnel or end users to access the Bloomberg Professional service. A BSAT is typically embedded in the Bloomberg keyboard. Each BSAT is configured to authenticate a binary number that has been created based on limited information from the specific person's finger image.

Business Continuity: the process of ensuring the timely response to and effective recovery of essential data, products, services, and functions provided to clients from unanticipated business disruptions that may affect data, facilities, technology, or Personnel.

Business Continuity Coordinator: appointed by Business Continuity Planning Manager and responsible for specific or multiple business continuity and disaster recovery plans within a Department.

Business Continuity Planning Manager: a manager within a Department responsible for the entire Department's business continuity and disaster recovery plans.

CCTV: closed-circuit television.

Client Data: data Bloomberg collects from its clients and end users through their use of Bloomberg's products and services.

Compliance: the Compliance Department of Bloomberg.

CM: Crisis Management, which is the identification of threats to Bloomberg and its stakeholders, and the methods used by the organization to deal with threats and other crisis situations once they have occurred.

Communal Areas: areas and other points where authorized and unauthorized Personnel may enter.

Community-wide Client Data: Client Data that is available to Personnel and the applicable community of Bloomberg product users, in order to facilitate interaction with one another.

Company Communications Systems: the use of software, the Internet, **IB<GO>**, **MSG<GO>** and other email systems, as well as any other Company-owned means of electronic communication.

Company Equipment: equipment and materials provided by Bloomberg including, but not limited to, electronic mail, voice mail, telephones, Internet, postage, copy and fax machines, personal computers, laptop computers, cellular and mobile devices, other hardware/software, mobile applications, wireless and wired networks, and communications media.

Contingent Worker Confidentiality Agreement: the confidentiality agreement or confidentiality terms signed by contractors and temporary staff at the time of engagement.

Contingent Worker Policy Guide: a Company policy designed to acquaint all contractors and temporary staff rendering services to Bloomberg with Bloomberg and to provide contractors and temporary staff with information regarding some of the policies affecting their working relationship with Bloomberg.

Contingent Workers: contractors and temporary staff.

Corruption: the misuse of power (entrusted or otherwise) for private or other gain.

CRCO: the Chief Risk & Compliance Office of Bloomberg.

Crisis: a situation or event that presents a material impact or risk to:

- The life, health, personal safety, or rights of Bloomberg Personnel;
- Bloomberg assets, management, or business activities;
- The reputation of the Company or the confidence in a Company brand; or
- Shareholders, customers, business partners or the public.

Critical Locations: Tier 1 and Tier 2 facilities.

CTO: the Chief Technology Officer of Bloomberg.

Departments: the following are the current Departments of Bloomberg:

- Accounting
- Analytics
- Application Specialists
- Bloomberg Institute
- Chief Risk and Compliance Office
- CTO Office
- Communications and Government
- Compliance
- Contracts
- Core Product
- Cross-Platform Initiatives
- Enterprise Solutions
- Geller
- Global Data
- Industry Verticals
- Legal
- Marketing
- Media
- News
- People Operations
- Research and Development
- Sales
- Technical Operations
- Tradebook
- Trading Solutions
- Workplace Operations

Department Manager: the Manager of a Department.

Department Member: Personnel within a Department.

Department Vendor Manager: a Manager within a Department responsible for managing a vendor relationship.

Disaster Recovery: a subset of Business Continuity, the process of ensuring the recovery of systems, applications, and infrastructure in the event of a disaster.

Discrimination: treating an employee less favorably in connection with the terms and conditions of employment because of his/her membership in a protected class.

EAP: the Employee Assistance Program is a confidential program available to all Bloomberg employees and their families, which provides individuals with an opportunity to discuss and

resolve their difficulties with the assistance of experienced, licensed, and certified mental health professionals.

Employee Confidentiality Agreement: the confidentiality agreement or confidentiality terms signed by employees at the time of hire.

Global Resource and Information Core Guide: a Company policy designed to acquaint full-time and part-time employees with Bloomberg, and to provide full-time and part-time employees with supplemental information about working conditions, benefits, responsibilities, and some of the policies affecting employment.

Harassment: conduct that denigrates or shows hostility or aversion towards an individual based on a protected classification that (i) adversely affects such individual's employment opportunities or working relationship with the Company, (ii) has the purpose or effect of unreasonably interfering with an individual's work performance, or (iii) creates an intimidating, hostile, or offensive working environment. Harassment may take different forms, and may involve, but is not limited to, visual displays, suggestive or offensive remarks or jokes, slurs or epithets of any kind, gestures, unwelcome sexual advances or demands, propositions, or unwanted physical contact.

Hiring Manager: the manager in the Department who has extended the offer of employment to the potential employee.

Human Resources: the Human Resources Department of Bloomberg. Previously referred to as Professional Development.

Incident: any event that presents a material impact or risk to Bloomberg facilities, Personnel, business operations, or reputation.

Information Security: the protection of information systems and the data contained within those systems which takes into account business and legal or regulatory requirements and contractual obligations.

Information Systems: the Information Systems Department of Bloomberg.

IRT: the Incident Response Team is comprised of select Personnel from across the Company who are notified and assembled when an Incident of sufficient magnitude occurs. Core members of the IRT are the CRCO, Legal, Engineering, and Operations.

IRT Leader: the individual selected by Security to lead the IRT.

ISMP: the Information Security Management Program that forms the strategic direction for the execution of information security within Bloomberg.

Legal: the Legal Department of Bloomberg.

Legal Hold Order: an order issued by Legal that sets forth the recipients' obligation to take reasonable steps to preserve documents that may be relevant to a potential litigation, audit, or governmental investigation.

Management Committee: the Management Committee of Bloomberg.

Managers: managers and team leads.

Office Areas: non-communal or non-secure areas accessible only by authorized Bloomberg Personnel.

Operations: the Operations Department of Bloomberg.

PDCA: Plan, Do, Check, Act cycle, a four-step repeatable cycle used for managing change and continuous improvement.

Personal Client Data: Client Data about an identifiable individual client or end user of Bloomberg products or services.

Personal Data and Information: certain personally identifying data and information that Bloomberg may collect about its employees and/or Contingent Workers at various times during their employment/engagement or in connection with their application for employment/engagement.

Personnel: all employees, contractors, and temporary staff of Bloomberg.

Policy: the specific policy referred to in the Policy Scope section of this document.

Policy Approval Committee: the committee that was delegated the authority by the Management Committee to approve certain Policies.

Principles: the Client Data Principles.

Procurement: the Procurement Department of Bloomberg.

Records: certain documents and information (whether in electronic or hard-copy form) that shall be retained to support Bloomberg's operational business purposes and meet applicable legal and regulatory requirements, including organizational structure, tax and accounting matters, Human Resources matters, safety records for Bloomberg's premises and employees, environmental compliance, insurance coverage, purchasing records, client contracts and related invoices, Company-wide policies and procedures regarding Bloomberg information, and updates, revisions, and waivers corresponding to such policies and procedures.

Records Classification Scheme: a document maintained by Legal that defines the types of Records created, received, processed or retained by Bloomberg.

Records Retention Schedule: a document maintained by Legal that assigns a minimum retention period for Record classes identified in the Records Classification Scheme.

Recovery Strategy: a defined and documented approach for recovering systems, processes, or applications in the event of a business interruption.

Restricted Client Data: Client Data that has been deemed highly sensitive and may only be accessed by or disclosed to Personnel who have a business need; access is controlled directly by the CRCO.

Risk Assessment Methodology: the process by which Security conducts risk assessments to identify, quantify, and prioritize risks against criteria for risk acceptance and threats.

SDLC: the risk-based System Development Life Cycle that requires several security controls in the development process. The risk-based process shall ensure that more critical systems or systems processing sensitive information are subject to appropriate security controls.

Security: the Security Department of Bloomberg.

Security Operations Centers: dedicated space within data centers where network security and infrastructure Personnel are located.

Security Steering Committee: the Security Steering Committee is comprised of the CRCO, Head of Engineering, and CTO.

Security Working Group: a group of senior IT managers appointed by the Security Steering Committee to address various information security topics.

Senior Management: senior level managers within a Department.

Social Media Policy: the policy, found on **POLY<GO>**, which sets forth the responsibilities of Bloomberg employees, contractors, and temporary staff when engaging in social media and also provides a list of prohibited subjects.

Tier 1 Facility: either a data center/node or a Bloomberg site larger than 25,000 square feet.

Tier 2 Facility: a service site (e.g., Regis site) or a site that is between 10,000 and 25,000 square feet or has more than 200 Personnel.

Vendor: third party vendors. Vendors include any person or company that:

Bloomberg

- Licenses systems, services, or technology for use by Bloomberg Personnel, contractors or Bloomberg clients;
- Performs functions on Bloomberg's behalf for those products or services Bloomberg chooses not to conduct internally or Bloomberg does not originate (outsourcing); or
- Manufactures critical supply chain products and services.

Operations

List of Environmental Awards

Responsible Sourcing and Procurement Guideline

Bloomberg Ink FSC Chain of Custody

Environmentally Preferred Language in RFX

Sustainability Language in Contracts

Scrapper Certificate of Compliance

Environmental Survey for Electronics Recyclers

Bloomberg Supplier Code of Conduct

SUSTAINABILITY AWARDS & PARTNERSHIPS

2017 Awards & Partnerships

In-Plant Printing and Mailing Association (IPMA) IN 2017

Bloomberg's in house print business, Bloomberg Ink, has been named "Print Center of the Year" as well as "Best in Show" in the Non-Offset category by the In-Plant Printing and Mailing Association (IPMA). The team has already been recognized with three Gold and two Silver awards by IPMA on items produced.

<http://ipma.org/2017-ipma-award-winners/>

E-STEWARDS ENTERPRISE

Bloomberg is an e-Stewards Enterprise which exemplifies our commitment *to make best efforts to use e-Stewards certified recyclers to safely, ethically, and responsibly recycle our IT assets.*

<http://e-stewards.org/learn-more/for-enterprises/overview/current-enterprises/>

GREEN POWER PARTNER

Bloomberg is an EPA Green Power Partner, helping to support the development of new renewable generation capacity nationwide while also helping to protect the environment.

<https://www.epa.gov/greenpower/green-power-partner-list>

GRI GOLD COMMUNITY

Bloomberg is a member of GRI's GOLD Community members, which includes diverse companies and organizations across business, consultancies, civil society, academia, labor, public and intergovernmental agencies.

<https://www.globalreporting.org/network/GOLDCommunity/Pages/default.aspx>

LEADERSHIP IN ENERGY AND ENVIRONMENTAL DESIGN (LEED) OFFICES

All new and refurbished offices are built to LEED standards included but not limited to; recycling of construction waste, low VOCs, daylight sensors, efficient HVAC, reduced lighting power and fixtures that reduce water use.

To see a full list of Bloomberg's completed and scheduled LEED Certified Projects visit:

<http://www.usgbc.org/projects?keys=Bloomberg>

Prior Awards

AWARD OF EXCELLENCE FOR SUSTAINABLE FACILITY OPERATIONS & MANAGEMENT

Bloomberg received the Award of Excellence from the International Facility Management Association (IFMA) in 2015.

<http://awards.ifma.org/>

CRRA: BEST FIRST TIME REPORT-1ST RUNNER UP (2012) & INNOVATION IN REPORTING-WINNER

The CRRA is the only global annual awards for corporate responsibility (CR) reporting. Bloomberg was recognized for best first time report and innovation in reporting.

<http://www.corporateregister.com/crra/>

Prior Awards

EPA GREEN POWER PURCHASING

We won an award from the EPA Green Power Partnership at their Green Power Leadership Awards Ceremony for Green Power Purchasing. We are the 22nd largest procurer of renewable energy credits in the United States.

<https://www.epa.gov/greenpower/2012-past-award-winners>

GREEN POWER MARKET DEVELOPMENT

Bloomberg earned the Green Power Market Development award which recognizes organizations and individuals building and growing the voluntary market for green power.

<https://resource-solutions.org/press-releases/101716/>

INNOVATION IN REPORTING: WINNER

The Bloomberg Annual Impact Report was recognized for the third time by the Corporate Register (CRR), this time for Innovation in reporting.

<http://www.corporateregister.com/crra/?d=2016>

OUTSTANDING CORPORATE LEADER

Sustainability Roundtable, Inc recognized Bloomberg as the Sustainable Business & Enterprise Roundtable's (SBER) Outstanding Corporate Leader for 2016 "because of its industry leading best practices in driving greater sustainability throughout Bloomberg's global real estate and operations portfolio." Bloomberg, first recognized in 2014, is the first company to be recognized a second time.

http://www.cswire.com/press_releases/39594-Bloomberg-Named-Outstanding-Corporate-Leader-of-2016?tracking_source=rss

PRODUCT OF THE YEAR (WRVT)

Environmental Leader awarded Bloomberg's Water Risk Evaluation Tool (WRVT) the Product of the Year designation.

<https://www.environmentalleader.com/products/bloomberg-lp-the-water-risk-valuation-tool/>

PRODUCT OF THE YEAR (CRVT)

We won the 2014 Product of the Year for our Carbon Risk Valuation Tool (CRVT)

<https://www.environmentalleader.com/products/bloomberg-lp-the-water-risk-valuation-tool/>

ROCKLAND RECYCLES AWARD

Each year the Rockland County Solid Waste Management Authority recognizes excellence in recycling and/or waste prevention/reduction programs.

<http://www.rocklandrecycles.com/page/rockland-recycles-awards-131.html>

RESPONSIBLE SOURCING AND PROCUREMENT GUIDELINE

Our Mission

Bloomberg L.P. ("Bloomberg") is committed to working with our suppliers to:

- Operate an efficient and sustainable supply chain that supports our corporate responsibility programs
- Develop sourcing solutions in line with customer, regulatory and wider stakeholder needs and expectations
- Highlight and track the Chain of Custody ("CoC") for all precious and conflict minerals as well as other "high impact" items
- Ensure that all precious and conflict minerals have been responsibly sourced in accordance with all local, federal and international laws and regulations, as well as this guideline.
- Prohibit the use of child, convict/prison or slave labour while ensuring that Bloomberg and our suppliers abide by globally recognized, UN mandated human rights policies
- Create long term value and reduce risk for our business, our suppliers and our stakeholders

How does Bloomberg define its Supply Chain?

Bloomberg defines its supply chain as the goods and services purchased and/or sourced for and utilized in its operations. This includes raw materials sourced for the construction of its offices and their interiors, including office furniture, as well as Bloomberg branded products (Flat Panels, Keyboards & B-Units), marketing/premium items provided to our clients and/or employees, electronics hardware procured for our operations and paper for our publishing business (Markets Magazine & Bloomberg Businessweek). Responsible sourcing is a key principle in Bloomberg's procurement approach and is given strong consideration alongside other factors such as price and quality.

To whom does this policy apply?

Bloomberg's Responsible Sourcing Policy applies to all procurement professionals and individuals designated with authority to procure items employed by Bloomberg, as well as to suppliers and subcontractors who purchase goods or services on behalf of Bloomberg.

What is Responsible Sourcing of Materials?

Responsible sourcing is an ethos which guides supply chain management and product stewardship by taking into account the **social, economic and environmental** impacts of a product over the entire course of its useful life. It is a holistic approach to managing the product's impact from cradle (raw material extraction) to grave (final disposal).

Why do it?

Responsible sourcing gives sourcing professional's confidence that the raw materials and products they choose for use throughout Bloomberg's operations have minimal adverse social, environmental, and economic impacts.

• *Construction & Building*

The construction industry has a wide ranging impact on both the local and international environment. Procuring materials through an Environmental, Safety and Ethical Management System ensures that the impact of the structure can be minimized

Historically, timber construction products were the only products available from a certified, sustainably managed source with a certified CoC beyond that required by regulation. Bloomberg works to ensure that all of its "high impact" raw material inputs (i.e., bronze, metal stone, timber) are tracked in accordance with best-in-class chain of custody standards and other environmental management systems (such as EMAS, ISO14001, BES 6001, etc.).

• *Wood & Timber*

It is Bloomberg's policy that 100% of timbers come from legal and sustainable FSC (Forest Stewardship Council) timber sources with full CoC. FSC CoC is defined as the path taken by raw materials, processed materials or finished products from the forest to the consumer, including each stage of transformation, manufacturing, storage and transport where progress to the next step involves change of ownership of the materials or products.

In addition, Bloomberg's suppliers should ensure that wood/wood products are in compliance with applicable local and international law/regulations governing their sourcing and movement. This would include but is not limited to: the U.S. Lacey Act, rules governing the use/treatment/disposition of solid wood packaging materials, etc.

There are a number of steps that providers of timber for Bloomberg must undertake to ensure CoC:

1. Notify your timber supplier that only FSC timber is to be delivered to the site
2. Include this requirement in the project's subcontract documents
3. All logistics staff should be made aware of this requirement and instructed to reject any non-compliant timber at the site

4. You must retain timber delivery tickets as proof of compliance. An example of a timber delivery ticket can be found at the end of this guideline (Example 1)
5. You must keep a timber register that details the type and quantity of timber delivered to the site.

Paper

Using paper made from recycled and FSC-certified fiber is the cornerstone of our purchasing policy. Choosing recycled and FSC paper will have a direct, profound and measurable impact. This will reduce pressure on natural forests and their ecosystems by creating a demand for “waste paper” that would otherwise go to landfills. Recycled and FSC paper also reduces energy, water, and chemical use during the manufacturing process. The FSC certification scheme best meets our criteria for robust forest protection because, among other attributes, it is the most inclusive and transparent process. The FSC certification scheme also provides a view across multiple concerns - social, economic, and environmental.

General Procurement

Bloomberg has developed a comprehensive Green Operating Guideline that outlines our policies governing several areas including (but not limited to): Environmentally Preferred Purchasing of goods and services; 3rd Party Printer services; Construction Materials and Energy Star Electronics Equipment. Excerpts from those policies deemed relevant to this Responsible Sourcing and Procurement Policy are below. The comprehensive Green Operating Guidelines are available on the Bloomberg Impact website at http://www.bloomberg/bcause/report_supplements.

The procurement of Engineering Hardware, Electronic Products & Appliances should include one or more of the following criteria (where applicable):

- Products used should reduce Greenhouse gas emissions compared to comparable products
- The delivery of products should take into account the emissions from delivery and seek to minimize where possible.
- Product should come from a local/regional manufacturing or assembly plant.
- Product should have an Energy Star or Energy Smart designation, or some other feature that minimizes power consumption during its useful life.
- PCs, Notebooks and other equipment should contain power management settings
- Products should contain non-brominated flame retardants (BFR). Note some companies are in the process of phasing out brominates, so inquire as to when the non-brominated products will be released.
- Products should not contain parts made with Polyvinyl Chloride (PVC).
- Equipment should meet applicable environmental, health, and safety standards in the applicable country(s) where the items are to be made available (i.e., made without Hazardous Substances like lead, which can be harmful to the environment).
- Manufacturers should reduce the amount of waste from the manufacturing process or recycle percentage of waste.
- Company providing products should have Asset Recovery Services (ARS) or a Commercial Asset Recovery Program.

Energy Star

In order to improve the energy efficiency of our inventory, high value products such as computers, monitors, copiers, printers, scanners, fax machines, refrigerators and other appliances shall meet the criteria listed below. It is Bloomberg's intent that 90% of the cost of the above mentioned class of items will meet at least these two criteria:

- Energy Star when available
- Electronic Product Environmental Assessment Tools (EPEAT) bronze level, or higher, rated products

Furniture and Furnishings

When purchasing new furniture, Bloomberg will look for items with the following characteristics: FSC certified wood, recycled or rapidly renewable resource content, no added urea formaldehyde, manufactured locally, and packaged with minimal material. It is Bloomberg's goal that 30% of all furniture purchases meet the following additional specifications:

- All furniture products should contain recycled content. The acceptable range for furniture manufactured from post-consumer steel and plastic is 30% to 100% for post-consumer recycled content and 50% to 100% for total recycled content (pre-consumer plus post-consumer).
- Desk accessories should be made of recycled materials. The acceptable range for plastic desk accessories such as pencil cups, magazine files and telephone stands, is that they contain 25%-100% post-consumer recycled content and 50%-100% total recycled content (pre-consumer plus post-consumer). The acceptable range for steel or metal desk accessories is that they contain 10%-100% post-consumer recycled content and 25%-100% total recycled content (pre-consumer plus post-consumer).
- Bloomberg will endeavor to purchase salvaged, refurbished and/or used furniture for their facilities whenever feasible.
- GreenGuard certified furniture is preferred.

How is Chain of Custody assurance achieved?

Bloomberg will work with all relevant suppliers to ensure that a proper CoC system is in place, which enables the Company to track a

product's entire life cycle from manufacture to disposal. The following systems need to be put in place for any project deemed substantial to Bloomberg and/or the environment.

Quality System Requirements

1.1 Documented Procedures

Company shall have documented procedures that detail the following: 1) the company's procedures for the tracking and handling of certified material from ordering through final product sales and shipping or use; 2) the responsible personnel or staff positions for the control system; 3) the forms and records used for certified tracking and handling; 4) the procedures for compiling volume summary data for certified purchases, production, and sales per product group, supplier/customer, and month; 5) the procedures for labeling and logo use (if applicable); 6) the protocol for maintaining records that pertain to certification.

1.2 Responsibility

- A designated individual shall be responsible for COC controls and compliance.
- Key personnel shall be designated and informed of their specific responsibilities within the Chain-of-Custody control system.

1.3 Product Group Assignment

- A product group schedule shall be prepared that includes: 1) the species of each product group; and 2) a designation of the product group as either 100% ethically sourced or percentage that is responsibly sourced.
- The product group schedule shall be kept up-to-date and available upon request.

1.4 Training

- Training requirements for all applicable staff shall be clearly defined.
- Training/orientation on the handling and representation of certified products shall be completed.
- Training records shall be kept to demonstrate training that has taken place.

1.5 Records and Reports

- Quantity records of certified material purchasing/receiving, production (including applicable conversion factors), and certified sales and shipping shall be maintained and readily available in summary format for annual audit review.
- Records shall be maintained for all purchases, processing, and sales of certified products, as well as marketing, advertising, and any other public information pertaining to certification for a minimum of 5 years.

How is responsible sourcing ascertained?

The appropriate materials procured shall have an Environmental Management System such as **ISO14001** or **EMAS** (Eco-Management and Audit Schemes), or **BES 6001** or similar at **PROCESS** and **EXTRACTION** stages. If the company is smaller (generally less than 30 staff) then **BS8555** can be used (the precursor to **ISO14001**). Bloomberg also requires that goods be purchased from sources with environmental, health, safety and quality standards in place at each stage of procurement.

Labour and Human Rights within Bloomberg's Responsible Sourcing Policy

Bloomberg's Responsible Sourcing and Procurement Policy is based on developing and maintaining an economically sound and prosperous business. Bloomberg assumes its responsibilities towards both the communities and environments in which we operate, and towards our employees, business partners and society in general. We have distilled our approach into the following key commitments:

- We are committed to doing business with a high degree of integrity and ethics
- We comply with all known applicable legal and regulatory requirements that apply in the countries in which we do business
- We respect the United Nations Declaration of Human Rights and recognize our responsibility to observe those rights as they inform our responsibility toward our employees and the communities in which we operate.
- Suppliers shall not discriminate against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring or in other employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination. Suppliers shall not require a pregnancy test or discriminate against pregnant workers except where required by applicable laws or regulations or where prudential concerns around workplace safety make it reasonable to take pregnancy into account. In addition, suppliers shall not require workers or potential workers to undergo medical tests that could be used in a discriminatory way except where required by applicable laws or regulations or where prudent for the maintenance of workplace safety.
- Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labour. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Suppliers shall ensure that third-party

agencies providing workers are compliant with the provisions of this Guideline and the laws of the sending and receiving countries, whichever is more stringent in its protection of workers. Suppliers shall ensure that contracts for both direct and contract workers clearly convey the conditions of employment in a language understood by the worker. Where workers are required to pay a fee in connection with obtaining employment, suppliers shall be responsible for payment of all fees and expenses in excess of the amount of one month of the worker's anticipated net wages. Such fees and expenses include, but are not limited to; expenses associated with recruitment, processing, or placement of both direct and contract workers.

- Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, workers shall be compensated for overtime hours at the premium rate required by applicable laws and regulations. Suppliers shall not use deductions from wages as a disciplinary measure. Suppliers shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. Suppliers shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.

UN Global Compact

Bloomberg is a signatory of the UN Global Compact demonstrating our commitment in embracing, supporting and enacting, within our sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

Policy on Conflict Minerals

Together with other companies, nongovernmental organizations (NGOs) and governments, Bloomberg is addressing concerns about the use in our supply chains of "conflict minerals" mined in identified countries of concern. These materials, presently identified as tin, tantalum, tungsten and gold, whose extraction and trade can contribute to destabilizing the country and regions in which they are mined, are mixed with material from non-conflict sources as they move from the identified countries of concern into global processing and manufacturing operations. Tin, tantalum, tungsten and gold sourced from global markets are used in Bloomberg's branded products, as well as electronics that are purchased from our vendor partners. Because of the possible connection, however remote, between our products and the issues in the identified countries of concern, we have committed to improving our conflict-free sourcing practices in the following ways:

- Bloomberg is working to be compliant with the rule mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act to require companies to publicly disclose their use of conflict minerals that originated in the DRC or an adjoining country and disclosing our usage of these materials in the production of Bloomberg branded products
- Bloomberg prohibits the explicit purchase of any conflict minerals that knowingly come from the DRC
- Bloomberg will support and follow the Electronics Industry Citizenship Coalition and Global e-Sustainability Initiative (GeSI) in establishing a "Conflict-Free Smelter" program in which metals smelters are audited to verify the origins of their tin, tantalum, gold and tungsten ores.

Bloomberg recognizes that its influence within the marketplace is limited by comparison to other large manufacturers/distributors/suppliers of electronics and therefore relies on larger industry players and non-profits to set guidelines and standards across the industry. Bloomberg will endeavor to follow best-in-class standards (such as those listed above) to drive its conflict mineral purchases and work across the industry to identify best-in-class suppliers who are abiding by the highest standards and certifications available in the marketplace.

Rainforest Alliance

BLOOMBERG INK, A DEPARTMENT OF BLOOMBERG L.P.

431 RIDGE RD
DAYTON, NEW JERSEY 08810
UNITED STATES

IS CERTIFIED FOR FOREST STEWARDSHIP COUNCIL™ CHAIN OF CUSTODY

Certificate Scope

Certificate Type: Multi-site Chain of Custody

Standard(s): FSC-STD-40-003 V1-0; FSC-STD-40-004 V2-1

Product group(s): Notebooks, Notepads, Envelopes, Books, Advertising
Materials, Calendars

Valid from October 30, 2013 to October 29, 2018

Certificate Registration Code: RA-COC-003563

FSC License Code: FSC-C020405

Certificate Issue Number: IN-2013-1

As a multi-site certificate, the activities and products included in the scope of this certificate are performed by a network of participating sites. Additional details regarding the scope, including a full list of products, species, and participating sites, are available at info.fsc.org.



Jon Jickling, Director, Certification
Rainforest Alliance
223 Broadway, 28th Floor New York, NY 10279 USA

RAINFORREST ALLIANCE IS AN FSC® ACCREDITED CERTIFIER

The validity of this certificate shall be verified on info.fsc.org. This certificate does not constitute evidence that a particular product supplied by the certificate holder is FSC certified and/or FSC Controlled Wood. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required FSC claim is clearly stated on invoices and shipping documents.

This certificate is the property of Rainforest Alliance. This certificate and all copies or reproductions of this certificate shall be returned or destroyed if requested by Rainforest Alliance.

Version July 2013



EXAMPLE OF THE TYPE OF ENVIRONMENTALLY PREFERRED LANGUAGE IN RFX'S

The primary objective of Bloomberg's sustainability strategy is to decouple the company's growth from environmental impact, while proving the business case for sustainable operations. This includes procuring goods and services that have a lesser or reduced effect on human health and the environment when specifically compared with other goods and services that serve the same purpose. To help us achieve our goals and objectives, we include sustainability criteria in our RFX process. Specifically, we inform vendors that our sustainability initiative requires vendors to meet or exceed the requirements in our current sustainability operational guidelines. Vendors are asked to confirm that they have read the guidelines and confirm that they can adhere to them. Additionally, we inquire about whether the vendor releases a sustainability report and ask them to send the report to bsustainable@bloomberg.net. Lastly, we ask vendors to provide a copy of their corporate social responsibility report and agree to adhere to our Supplier Code of Conduct.

Internal confirmation:

Bloomberg's sustainability initiative requires vendors to meet or exceed the requirements in the attached below BSI Operations Guidelines.

Do you confirm that you have read the BSI Operational Guidelines and can adhere to the requirements?

RFX questions:

Q00019 Policies Yes or No Question Bloomberg's sustainability initiative requires vendors to meet or exceed the requirements in the current BSI Operations Guidelines found on the web at: <http://www.bloomberg.com/bcause/>. Do you confirm that you have read the BSI Operational Guidelines and can adhere to the requirements?

Q00020 Policies Yes or No Question Does your company release a sustainability report?

Q00021 Policies File Attachment If your company releases a sustainability report, please provide the URL to your company's report and/or attach a copy of the report below. In addition, email the weblink and/or the report to bsustainable@bloomberg.net.

Q00022 Policies File Attachment Provide a copy of your Corporate Social Responsibility Policy.

Q00023 Policies Yes or No Question Do you agree to adhere to the below Supplier Code of Conduct guidelines provided by Bloomberg?

SUSTAINABILITY LANGUAGE IN CONTRACTS

We ask Service Providers to represent, warrant and covenant to Bloomberg and its affiliates that to the extent applicable and practicable, they shall seek to use products certified under the “Green Seal” certification process, or, at Bloomberg’s discretion, a comparable standard, under the most recent version of the applicable standard for all goods or products used to provide the Services and Deliverables, and in any event shall conform to all applicable requirements of law.

In addition, Bloomberg reserves the right to ask Service Providers to provide information regarding their sustainability programs and initiatives and highly encourages all Service Providers to publicly release a Global Reporting Initiative (GRI) Compliant Sustainability Report. In the event that a Service Provider releases a sustainability report, it shall send a web link to the report to BSUSTAINABLE@BLOOMBERG.NET for review. Upon request Service Providers shall provide to Bloomberg ongoing reports and data pertaining to environmental or other aspects of the Services which may be used by Bloomberg in its discretion to obtain certifications or achieve standards and in each case maintain them.

SCRAPPER CERTIFICATE OF COMPLIANCE

THIS CERTIFICATION is made by [INSERT COMPANY] ("Company") as of the date of signature below. Company hereby represents, warrants and covenants to Bloomberg L.P. ("Bloomberg") as follows:

1. Company is in compliance with all applicable local, city, state, federal and international laws, rules and regulations including, but not limited to, all antidumping, environmental, safety and health and labor and employment laws, rules and regulations, and shall remain in compliance for so long as Company is performing any services for Bloomberg.
2. Except as otherwise disclosed to Bloomberg in writing, there are no judgments, liens, demands, claims, suits, actions, arbitrations or other proceedings outstanding, pending or threatened (or for which any basis exists) that in any way questions or jeopardizes (or could question or jeopardize) the ability of Company to perform any of Company's obligations in connection with the provision of services to Bloomberg.
2. Except as otherwise disclosed to Bloomberg in writing, there is no pending enforcement, administrative action or environmental claim or judgment against the Company, nor has the Company recently settled any such claim or judgment.

IN WITNESS WHEREOF, the Company has executed this Certification as of the date set forth below:

[INSERT NAME OF COMPANY]

By: _____

Name:

Title:

Date:

ENVIRONMENTAL SURVEY FOR ELECTRONICS RECYCLERS

Company:
Address:

Other Addresses:

Contact Name:
Voice No:
Fax No:
Email:
Website:

- 1) Please provide a description of your business and operations.**
For example: number of employees, years of operation, ownership and any ownership changes, facilities and their history, operations and services offered.
- 2) What materials do you process and Where do you send them?**
 - a) General IT and High Tech:
 - b) Metal:
 - c) Plastic:
 - d) Packing Materials (Cardboard, Foam):
 - e) Toxic Waste/Batteries:
 - f) Others:
- 3) What do you do with the used equipment that you receive? For example, what processing do you do to make electronics you receive ready for resale or recycling?**
- 4) What is your data security process for IT equipment that you receive (Hard drive erasure/destruction)?**
- 5) Do you export any materials? If so, what is the purpose of the export? What are the names of the importing facilities and countries of location? Please provide documentation of legality.**
- 6) What materials are sent from your facility and where do you send them?**
- 7) Do you send waste materials offsite for disposal in landfills or for incineration?**
- 8) Do you currently have outlets for all of the materials you receive and materials you generate?**
- 9) What is the difference in terms of volume between the input of electronics to your company vs. the output (via recycling or resale) and what is the difference with respect to the facility at issue in particular?**
- 10) Do you audit the facilities that receive materials from you?**
- 11) Do you provide documentation or certification of final disposition?**
- 12) Do you generate waste that is regulated, e.g. hazardous waste?**

- 13) Are you subject to environmental, health and safety regulation? If so, please describe.
- 14) What regulatory agencies have jurisdiction over your facilities and operations?
- 15) What environmental, health and/or safety permits, licenses, and registrations are required? Do you have them?
- 16) What agency notifications are required? Have you provided them?
- 17) Are you in compliance with all applicable regulations and permits?
- 18) What is your compliance history? For example, has your facility been inspected by federal, state or other government agencies having jurisdiction over environmental, health or safety matters within the last five (5) years? If so, with what results?
- 19) Are you currently subject to any investigations or proceedings relating to any environmental, health or safety matters? Do you have any notices of violations that remain unresolved?
- 20) Do you store any products or wastes outdoors?
- 21) Do you have an environmental management system, environmental risk management plan, or electronics recycling certification in place? Please describe.
For example, as to electronics recycling in particular are you certified or do you follow: "e- Stewards", "Electronics Recycler's Pledge of True Stewardship", Responsible Recycling "R2" Practices, "Plug into eCycling" guidelines, Recycling Industry Operating Standard ("RIOS"), Institute of Scrap Recycling Industries Electronics Recycling Operating Practices, "Certified Electronics Recycler®", ISO 9000 and/or ISO 14000.
- 22) Do you perform regular environmental, health and safety audits of your operations?
- 23) Do you have a trained employee who is responsible for environmental, health and safety onsite?
- 24) Do you provide environmental, health and safety training to your employees?
- 25) Do you have environmental insurance?
- 26) Will you allow verification through an on-site evaluation?
- 27) Please provide references and contact information for other businesses that have used your services.
- 28) Are you certified as e-Steward, R2/Rios, or ISO 14001? If yes, what certification do you have for each location?

Bloomberg Supplier Code of Conduct

Sustainability runs through everything we do at Bloomberg. Sustainability is at the core of decisions we make and is viewed as a key business driver for our products and services, internal operations and community engagement. Bloomberg takes a holistic view of sustainability. Our sustainability program integrates environmental, social, and governance factors into how we manage our internal operations and develop our products.

As such, we are committed to working with vendors who operate in a responsible and sustainable manner. The Bloomberg Supplier Code of Conduct (this “Code”) defines our minimum requirements with respect to the environmental, social and governance performance of our Suppliers. Suppliers are responsible to ensure their sub-contractors, business partners and suppliers (the “Supply Chain”) act in a manner consistent with this Code.

The Code

Bloomberg requires Suppliers to operate in accordance with the principles set forth in this Code and in full compliance with all applicable laws and regulations of the countries in which it operates. In instances where this Code requires Suppliers to operate to a higher standard than what is required by local law, Bloomberg requires Suppliers and the Supply Chain comply with this Code. Suppliers shall immediately notify Bloomberg of any conflict between this Code and local laws and/or regulations. If compliance with this Code might violate or conflict with local laws and/or regulations, we require Suppliers to promptly notify Bloomberg and explain how they intend to operate in a responsible manner.

If Suppliers identify any non-compliance with this Code, they are required to take corrective action in a timely manner. Failure to take timely corrective action may result in specific measures imposed by Bloomberg, including but not limited to the withdrawal of business.

Suppliers shall not provide, use or rely on the use of falsified documents or records for legal compliance or for meeting the requirements of this Code.

This Code is comprised of five sections: Section A - Labor and Human Rights; Section B - Health and Safety; Section C - Environmental; Section D - Ethics; and Section E - Management Systems.

Bloomberg requires Suppliers to uphold the following standards:

A. LABOR AND HUMAN RIGHTS

Suppliers shall commit to upholding the human rights of workers and treating them with dignity and respect in accordance with the principles and guidelines of the International Labor Organization and United Nations. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards, as set out at the end of this Code, were used as references in preparing the Code and may be a useful source of additional information.

1) Freely Chosen Employment

All work must be conducted on a voluntary basis and not under threat of any penalty or sanctions. Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring,

recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

There shall be no unreasonable restrictions on workers' freedom of movement in the facility or in regard to the entering or exiting of company-provided facilities.

As part of the hiring process, workers must be provided with a written employment agreement (or offer letter where applicable) in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment.

Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay deposits, or employer or agent recruitment fees, or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

Suppliers and the Supply Chain shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force; and not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4 of the UK's Modern Slavery Act 2015, as amended, or 48 CFR 52.222-50 Combating Trafficking in Persons of the US Code of Federal Regulations, as amended, or other laws or regulations in effect.

Suppliers shall include in their contracts with the Supply Chain anti-slavery and human trafficking provisions that are at least as onerous as those set out in this Code and shall implement due diligence practices to support this.

Suppliers shall notify Bloomberg as soon as they become aware of any actual or suspected slavery or human trafficking in a supply chain connected to Bloomberg. Suppliers shall maintain a complete set of records to trace the supply chain of all goods and services provided to Bloomberg which can be available for Bloomberg to view on request.

2) Child Labor Avoidance

Suppliers are not allowed to use child labor in any aspect of its supply chain. For the purpose of compliance with this Code the term "child" refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country in which services and/or products are being performed and/or manufactured (whichever is greatest). The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported.

Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts, and working overtime.

Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student

workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

3) Working Hours

Workweeks are not to exceed the maximum set by local law and should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days. The working of overtime must be voluntary and in compliance with other sections of this Code.

4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits (including paid leave and contributions for all social insurances). Suppliers shall pay workers promptly and in full without any deductions for disciplinary matters, or other deductions not provided for by local law. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor must be within the limits of the local law and in compliance with this Code.

5) Humane Treatment

Bloomberg does not tolerate the harsh and inhumane treatment or threat of such treatment including but not limited to, any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Suppliers shall establish clearly defined disciplinary policies and procedures to prevent such treatment and communicate those policies and procedures to workers.

6) Non-Discrimination

Suppliers shall be committed to a workforce free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status, or any other category protected by applicable law in hiring and employment practices such as wages, promotions, rewards, and access to training. Suppliers shall apply the principle of equal pay for men and women workers for work of equal value. In addition, Suppliers shall not subject workers or potential workers to medical tests that could be used in a discriminatory way.

7) Freedom of Association

Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.

Workers and/or their representatives shall be able to openly communicate and share ideas and concerns, including grievances, with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment. If freedom of association and/or the right to collective bargaining are restricted by law, Suppliers shall, without violating applicable law itself, not interfere with efforts by workers to develop parallel means for independent and free association and collective bargaining.

B. HEALTH AND SAFETY

Suppliers shall commit to providing and maintaining a safe work environment that integrates sound health and safety management practices into its business. Suppliers shall provide workers with appropriate health and safety training in their primary language and shall regularly monitor risks and hazards that may impact health and safety of workers, including but not limited to risks associated with structural integrity of facilities, fire, electrocution and hazards associated with exposure to noise dust and chemicals. Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information for suppliers in providing and maintaining a safe work environment.

1) Occupational Safety

Suppliers shall control workers' exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, Suppliers shall provide workers with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Workers shall not be disciplined for raising safety concerns and shall be encouraged to raise safety concerns.

2) Emergency Preparedness

Suppliers shall identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

3) Occupational Injury and Illness

Suppliers shall put procedures and systems in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

4) Industrial Hygiene

Suppliers shall identify, evaluate and control workers' exposure to chemical, biological and physical agents. Suppliers must use engineering or administrative controls to control overexposures. When hazards cannot be adequately controlled by such means, Suppliers shall protect worker health by adopting appropriate personal protective equipment programs.

5) Physically Demanding Work

Suppliers shall identify, evaluate and mitigate workers' exposure to the hazards of physically demanding tasks, including, but not limited to, manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks.

6) Machine Safeguarding

Suppliers shall evaluate production and other machinery for safety hazards. Where machinery presents an injury hazard to workers, Suppliers shall provide and properly maintain physical guards, interlocks and barriers.

7) Sanitation, Food, and Housing

Workers must have free and unrestricted access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by Suppliers or labor agents shall be clean and safe, and include appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

8) Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

C. ENVIRONMENTAL

Suppliers shall commit to minimizing the adverse effects of its manufacturing operations on the community, environment and natural resources, and to safeguarding the health and safety of the public from such adverse effects. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information. Suppliers are expected to stay current with evolving industry standards and best practice and incorporate other such management system standards and guidelines as they deem relevant based on their industry expertise.

In addition to the environmental provisions outlined in this Code, suppliers must also comply with the policies and guidelines set forth in Bloomberg's Sustainability Operational Guidelines regarding:

- 3rd Party Printer Guidelines
- BLP Green Construction Policy
- Waste Management Policy
- Green Cleaning Policy
- Integrated Pest Management Policy
- Sustainable Warehouse Guidelines
- Corporate Green Events Policy

The Bloomberg Sustainability Operational Guidelines can be accessed at <https://data.bloomberglp.com/company/sites/28/2017/01/Operating-Guidelines-4.11.17.pdf>

1) Environmental Permits and Reporting

Suppliers shall obtain and keep current all required environmental permits (e.g. discharge monitoring), approvals and registrations and shall comply with all operational and reporting requirements.

2) Pollution Prevention and Resource Reduction

Suppliers shall reduce or eliminate waste of all types, including water and energy, at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

3) Hazardous Substances

Suppliers shall identify and manage any chemicals and other materials that if released to the environment would pose a hazard and ensure the safe handling, movement, storage, use, recycling or reuse and disposal of such chemicals and other materials.

Suppliers shall comply with the Restriction of Hazardous Substances Directives included in the Institute of Electrical and Electronics Engineers (IEEE) publication 1680 (<http://grouper.ieee.org/groups/1680/>).

4) Wastewater and Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Suppliers shall characterize, monitor, control and treat wastewater and solid waste generated from operations, industrial processes and sanitation facilities as required prior to discharge or disposal. In addition, Suppliers shall implement measures to reduce the generation of wastewater and conduct routine monitoring of the performance of its wastewater treatment systems.

5) Air Emissions

Suppliers shall characterize, monitor, control and treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations as required prior to discharge. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

6) Product Content Restrictions

Suppliers shall adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

7) Storm Water Management

Suppliers shall implement a systematic approach to prevent the contamination of storm water runoff. Suppliers shall prevent illegal discharges and spills from entering storm drains.

8) Energy Consumption and Greenhouse Gas Emissions

Suppliers shall track and document energy consumption and greenhouse gas emissions at the facility and/or corporate level. Suppliers shall look for cost effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

D. ETHICS

Suppliers shall commit to the highest standards of ethics in conducting all aspects of their business.

1) Business Integrity

Suppliers shall have a zero tolerance policy that prohibits any and all forms of bribery, corruption, extortion, embezzlement (covering promising, offering, giving or accepting any bribes), and facilitation payments. All of Suppliers' business dealings shall be performed in a transparent manner and be accurately reflected in Suppliers' business books and records. Suppliers shall implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

2) No Improper Advantage

Suppliers shall not promise, offer, authorize, give or accept bribes or other means of obtaining undue or improper advantage. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

3) Disclosure of Information

Suppliers shall disclose information regarding labor, health and safety, environmental practices, business activities, structure, financial situation and performance in accordance with applicable regulations and prevailing industry practices. Suppliers shall not falsify records or misrepresent conditions or practices in the supply chain. Bloomberg reserves the right to request Suppliers' anti-corruption policies and procedures as well as the policies and procedures of the Supply Chain.

4) Intellectual Property

Suppliers shall respect intellectual property rights and safeguard customer information. Suppliers shall manage the transfer of technology and know-how in a manner that protects intellectual property rights.

5) Fair Business, Advertising and Competition

Suppliers shall uphold standards of fair business, advertising and competition and have appropriate means to safeguard customer information.

6) Protection of Identity and Non-retaliation

Suppliers shall provide a mechanism by which employees can anonymously and confidentially report workplace grievances and / or alleged improper conduct of an employee, company officer, public official or official body without fear of retaliation. Suppliers shall communicate to their personnel the process by which they are able to raise any such concerns.

7) Responsible Sourcing of Minerals

Supplier shall attest that the items to be procured by Customer are manufactured without the use of any materials identified as "Conflict Minerals", or other such designated mineral/material within the scope of the US Dodd-Frank Wall Street reform and Consumer Protection Act 2010, as amended.

8) Privacy

Suppliers shall protect the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

E. MANAGEMENT SYSTEM

Suppliers shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to Suppliers' operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

1) Company Commitment

Suppliers shall have a corporate environmental, social and governance responsibility policy statement that affirms their commitment to compliance and continual improvement with such policy and is endorsed by executive management.

2) Management Accountability and Responsibility

Suppliers shall clearly identify company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management shall review the status of the management system on a regular basis.

3) Legal and Customer Requirements

Suppliers shall have a process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

4) Risk Assessment and Risk Management

Suppliers shall have a process to identify the environmental, health and safety and labor practices and ethics risks associated with Suppliers' operations. Suppliers shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5) Improvement Objectives

Suppliers shall have written performance objectives, targets and implementation plans to improve their environmental, social and governance performance, including a periodic assessment of their performance in achieving those objectives.

6) Training

Suppliers shall have programs to train managers and workers on how to implement their policies, procedures and improvement objectives, and to meet applicable legal and regulatory requirements.

7) Communication

Suppliers shall have a process for communicating clear and accurate information about their policies, practices, expectations and performance to workers, suppliers and customers.

8) Worker Feedback and Participation

Suppliers shall have ongoing processes to assess employees' understanding of the practices and conditions covered by this Code and to obtain feedback on such practices and conditions to foster continuous improvement. This shall include a mechanism by which employees can report alleged non-compliance with this Code and other ethical matters.

9) Audits and Assessments

Suppliers shall periodically assess and audit their policies, practices and performance to ensure conformity to legal and regulatory requirements, the content of this Code and customer contractual requirements related to social and environmental responsibility.

10) Corrective Action Process

Suppliers shall have a process to timely correct any and all deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11) Documentation and Records

Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to Suppliers' requirements which shall include appropriate confidentiality measures to protect privacy.

12) Supplier Responsibility

Suppliers shall have a process to communicate and monitor the requirements of this Code to the Supply Chain and to ensure compliance with this Code.

I, an authorized representative of _____ (name of Supplier), hereby acknowledge and agree to abide by Bloomberg's Supplier Code of Conduct and ensure that the employees, officer, directors, agents, suppliers, representatives of _____ (name of Supplier) are aware of and abide by this Code for the provision of goods and services to Bloomberg and during the performance of all agreements entered into with Bloomberg.

Signature: _____

Title: _____

Date: _____

References:

The following standards were used in preparing this Code and may be a useful source of additional information. Bloomberg is committed to the principles set forth in this Code and as such continuously reviews this Code and relevant external guidance to ensure the Code is updated as needed to align with current industry practices and requirements.

1. EICC, Electronic Industry Citizenship Coalition Code of Conduct, http://www.eiccoalition.org/media/docs/EICCCodeofConduct5_English.pdf
2. Dodd-Frank Wall Street Reform and Consumer Protection Act, <http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>
3. Eco Management & Audit System www.quality.co.uk/emas.htm
4. Ethical Trading Initiative www.ethicaltrade.org/
5. ILO Code of Practice in Safety and Health, www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf
6. ILO International Labor Standards, www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm
7. ISO 14001 www.iso.org
8. National Fire Protection Association www.nfpa.org/catalog/home/AboutNFPA/index.asp
9. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas <http://www.oecd.org/corporate/mne/mining.htm>
10. OECD Guidelines for Multinational Enterprises www.oecd.org/mne/
11. daviOHSAS 18001 <http://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/>
12. Universal Declaration of Human Rights www.un.org/Overview/rights.html
13. United Nations Convention Against Corruption