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Bloomberg Trading Facility Limited - Modern Slavery and Human Trafficking Statement

Bloomberg is committed to acting ethically and with integrity in all our business relationships. We expect those in our supply chain to align with our values and operate in accordance with the principles of the Bloomberg Supplier Code of Conduct and Bloomberg Impact Report <https://www.bloomberg.com/impact/downloads> and in full compliance with all applicable laws and regulations. The Bloomberg Supplier Code of Conduct outlines Bloomberg's expectations for Supplier conduct regarding labour and human rights, health and safety, environmental protection, ethics, and management practices.

OUR ORGANISATION

Bloomberg is a global business and information and news leader. Bloomberg delivers data, news and analytics through innovative technology, quickly and accurately. The wider organisation is headquartered in the United States and engages around 18,000 employees in 176 locations around the world. Bloomberg's European headquarters in London house around 4,000 employees and serve as a hub for the company's regional operations.

With regards to this statement, **Bloomberg Trading Facility Limited ("BTFL")** is authorised by the UK's Financial Conduct Authority to operate a multilateral trading facility (MTF). BTFL's MTF is a robust trading platform used by more than 1,000 global institutions for trading cash bonds, repos, credit default swaps, interest rate swaps, exchange-traded funds, equity derivatives and foreign exchange derivatives.

BTFL is a limited company which was incorporated in the United Kingdom in 2014 and whose registered office is 3 Queen Victoria Street, London, EC4N 4TQ. It is a wholly owned subsidiary of Bloomberg LP.

This statement is published on behalf of BTFL in line with the UK's Modern Slavery Act 2015, and references to "we", "us" and "our" are to BTFL.

SUPPLY CHAIN

Our direct supply chain involves the sourcing of goods and services to support the operation of our MTF. Given we are essentially an office-based service provider, we consider our supply chains to represent a relatively low risk with regards to modern slavery, servitude and human trafficking. The goods and services we purchase in relation to BTFL's business offering are limited and primarily relate to property, facility management and maintenance, information technology, media and professional services.

DUE DILIGENCE AND RISK ASSESSMENT

To identify and mitigate risks associated with slavery and human trafficking, we have in place systems that:

- Increasingly require suppliers who participate in a formal tender process (Request for Information or Request for Proposal) to accept Bloomberg's Supplier Code of Conduct

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- Perform social audits in targeted facilities within our supply chain that are the most vulnerable to threats of human trafficking, slavery and other related violations
- Monitor potential risk areas in our supply chains; and
- Protect whistleblowers.

POLICIES

In addition to our Supplier Code of Conduct and Bloomberg Impact Report, as part of our overall commitment to safe and ethical working practices and safeguarding of human rights, we have in place the following policies:

- An Anti-Slavery Policy making the prevention, detection and reporting of modern slavery in any part of the business or supply chains the responsibility of all of those working for Bloomberg (including BTFL) or under its control.
- A policy setting out General Standards of Conduct and Ethical behaviour, requiring staff to conduct themselves and Bloomberg LP business with the highest ethical standards, with integrity and within guidelines that prohibit actual or potential conflicts of interest or the perception of impropriety; and
- A Whistleblowing policy

TRAINING

BTFL conducts employee training, partnering with a vendor to train the relevant employees on the significance and risks of slavery and human trafficking and their obligations in this context. We are committed to maintaining and continuing these steps which seek to ensure no modern slavery or human trafficking in our supply chain or in any part of our business.

MONITORING AND IMPLEMENTATION

If issues are identified in relation to modern slavery, these will be reported to Human Resources or through the Bloomberg Hotline. More general issues in relation to the running of this policy will be reported back to Bloomberg LP's Global Operations team on an annual basis and, if required, more frequently.

Bloomberg LP's Global Operations team shall take responsibility for implementing the objectives considered in this statement and we will monitor progress of our efforts in this area.

This statement is made pursuant to section 54(1) of the UK's Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.



Peter T Grauer
Director and Chairman
Bloomberg Trading Facility Limited

Date: January 2019

Next Review: January 2020