

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:

- Facility Waste Management
- Green Cleaning Policy
- Green Events
- Integrated Pest Management
- Sustainable Design and Construction

The Bloomberg Sustainability Operational Guidelines can be accessed at

<https://www.bloomberg.com/impact/downloads/>

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