

# Bloomberg

## **Bloomberg Index Services 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. Through the Bloomberg Terminal®, real time financial information is provided to subscribers globally. The wider organisation is headquartered in the United States and engages around 18,000 employees and workers 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 Index Services Limited ("BISL") provides benchmark administration services across multiple asset classes. With expertise in capital markets, technology, data, pricing, analytics, distribution and research, BISL provides the global investment community with comprehensive solutions to fulfil their benchmarking needs.

BISL is a private 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 BISL in line with the UK's Modern Slavery Act 2015, and references to "we", "us" and "our" are to BISL.

### **SUPPLY CHAIN**

In addition to our London office, BISL has branches in the USA, Japan, Singapore, the Czech Republic and Australia.

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

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## **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
- 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; and
- 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 BISL) 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**

BISL 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.

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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 Index Services Limited**

Date: January 2019

Next Review: January 2020