

# Bloomberg - Modern Slavery and Human Trafficking Statement

This statement is published jointly on behalf of Bloomberg LP, Bloomberg Index Services Limited (BISL), Bloomberg Trading Facility Limited (BTFL), and Bloomberg Finance L.P. (BFLP), together (“**Bloomberg**”), and constitutes our Modern Slavery Statement for the financial year ending 31 December 2019.

## **Introduction**

Bloomberg is committed to acting ethically and with integrity in all our business relationships. Although it is for our business partners to manage their operations, 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 <https://www.bloomberg.com/procurement> and the 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 information and financial news leader. We give influential decision makers a critical edge by connecting them to a dynamic network of information, people and ideas. Bloomberg delivers data, news and analytics through innovative technology, quickly and accurately. Bloomberg's enterprise solutions build on the company's core strength: leveraging technology to allow customers to access, integrate, distribute and manage data and information across organizations more efficiently and effectively.

The wider organisation is headquartered in the United States and engages around 20,000 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.

BFLP is the owner of the Bloomberg Terminal and distributes the Bloomberg Terminal service and related products in a variety of jurisdictions. Whilst BFLP does not have any employees it does enter into contracts with both customers and suppliers.

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.

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.

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## **SUPPLY CHAIN**

In addition to our New York headquarters, Bloomberg has branches and operations in various jurisdictions throughout the Americas, EMEA and APAC.

Our direct supply chain includes the sourcing of goods and services to support the manufacturing, assembly, distribution and infrastructure of the Bloomberg Terminal and the publishing and distribution of our printed news products. In addition, Bloomberg sources products and services to support general office-based and administrative operational needs, including property, facility management and maintenance, information technology, distribution and logistics, media and professional services.

## **PHILANTHROPY**

Bloomberg supports charitable institutions dedicated to combating modern slavery and human trafficking. We work with more than 1,500 organizations worldwide, many of which aim towards advancing basic human rights of safety, education, and food security. At Bloomberg, we're committed to giving back to the cities in which we live and work. For more detail on Bloomberg's charitable initiatives, please visit our Philanthropies website at <https://www.bloomberg.com/philanthropy>

## **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 targeted social audits within our supply chain in order to ensure ethical standards are monitored and maintained;
- Monitor potential risk areas in our supply chains; and
- Protect whistleblowers (see further information on our Whistleblowing Policy in the "Policies" section below) to encourage reporting by both employees and third parties without fear of retaliation or detrimental treatment.

## **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 or under its control.
- A policy setting out General Standards of Conduct and Ethical behaviour, requiring staff to conduct themselves and Bloomberg business with the highest ethical standards, with

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integrity and within guidelines that prohibit actual or potential conflicts of interest or the perception of impropriety; and

- A Whistleblowing Policy, which provides further information on how whistleblowing can take place and who to contact should an employee know or suspect an instance of slavery or human trafficking has occurred.

## TRAINING

Bloomberg LP has partnered with a vendor to provide e-learning training to targeted employees on the significance and risks of slavery and human trafficking and our employees' obligations in this context.

As part of its training programme Bloomberg LP also requires all employees to undertake an annual review and attestation of policies relating to standards of conduct and ethical behaviour. We are committed to maintaining 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 can be reported to Human Resources or through the Bloomberg Ethics Hotline, which is accessible 24 hours a day, 7 days a week, 365 days per year.

Our Global Strategic Sourcing, Workplace Operations and Supply Chain areas shall take responsibility for implementing the objectives considered in this statement and we will monitor progress of our efforts in this area.

*This statement was approved by the Boards of BISL, BTFL and by the Chairman of Bloomberg LP, and BFLP and is made pursuant to section 54(1) of the UK's Modern Slavery Act 2015.*



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**Peter T. Grauer**

**Chairman**

Date: January 2020

Next Review: January 2021