

Bloomberg – Canada Forced and Child Labour Statement

Last Updated: May 30, 2024

1. Introduction

This Forced and Child Labour Statement (**Statement**) is made by Bloomberg Inc. (registration no. 929944) (**BI**), Bloomberg L.P. (registration no. 2110234) (**BLP**) and Bloomberg Finance L.P. (registration no. 4348344) (**BFLP**) (collectively, the **Reporting Entities**). The Reporting Entities, together with their affiliates and subsidiaries (collectively, **Bloomberg**), make this Statement for the financial year ended December 31, 2023. Forced and child labour remain global issues and here at Bloomberg, we are committed to playing our role in helping to eradicate them. Bloomberg is committed to acting ethically and with integrity in all our business relationships. Our key values define who we are and how we operate. We believe profit and principles are not mutually exclusive; they reinforce one another. Doing the right thing – by our people, our customers, our communities, and our planet – is also the best thing for our business. More information regarding our company and our values can be found [here](#).

This Statement is made pursuant to the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (the **Act**) and sets out the actions the Reporting Entities have taken to prevent and reduce the risk that forced or child labour is used at any step of the production of goods in Canada or elsewhere by the Reporting Entities or of goods imported into Canada by the Reporting Entities.

2. Our Structure, Operations and Supply Chains

2.1. Our Structure and Operations

BI, a corporation organized under the laws of the State of Delaware, is the general partner and parent company of BLP, and acts as a holding company with minimal separate operating activities.

BLP, a limited partnership organized under the laws of the State of Delaware, is a global leader in business and financial data, news, and insight. Bloomberg has more than 25,000 employees and maintains 155 locations around the world. Bloomberg maintains its global headquarters in the United States, at 731 Lexington Avenue, New York, NY 10022. In addition to Bloomberg's New York headquarters, Bloomberg has branches, subsidiaries and operations in various jurisdictions throughout the Americas, Europe, the Middle East and Africa and the Asia Pacific regions.

BFLP, a limited partnership formed under the laws of the State of Delaware, owns and distributes the Bloomberg Terminal® service and data products in a variety of jurisdictions. Whilst BFLP does not have any employees, it does enter contracts with both customers and suppliers, as outlined in this Statement. BFLP is a wholly-owned subsidiary of BLP.

The Reporting Entities come under Bloomberg's global compliance and risk management program.

2.2. Supply Chain

Bloomberg engages a mix of suppliers consisting of those with whom Bloomberg has long-term relationships, and others with whom Bloomberg engages on an ad hoc or short-term basis. Bloomberg's direct supply chain includes the sourcing of goods and services used in connection with the provision of the Bloomberg Terminal® service and data products, and the publishing and distribution of Bloomberg's printed news products. In addition, Bloomberg sources products and services to support office-based and administrative operational needs, including but not limited to:

- Property and utilities;

- Facilities management and maintenance, including cleaning and security;
- Information technology network/equipment, accessories, software and consulting services;
- Warehousing, distribution and logistics;
- Human resources such as employee benefits, training, recruitment and contingent workers;
- Financial services, including banking services and insurance;
- Media, marketing, and events travel and hospitality;
- Professional services such as accounting, audit, legal and tax consulting; and
- Data destruction, assets disposition, equipment refurbishments and collection.

In addition:

- BLP engages suppliers located predominantly in the United States and to a lesser extent in Ireland and China; and
- BFLP engages suppliers located predominantly in the United States and to a lesser extent in Japan and South Korea.

3. Forced and Child Labour Risks in our Operations and Supply Chains

3.1 In Our Operations

Based on an ongoing review and given the nature of Bloomberg's operations and workforce, we do not believe there is a meaningful risk of forced and child labour occurring in our own operations. In addition, our workforce is primarily comprised of employees who work in professional, office-based roles, which may reduce the level of risk that forced or child labour could occur.

All Bloomberg employees are provided with remuneration exceeding minimum wage, and salaries are benchmarked based on third-party industry best practice tools and specifics regarding individual roles. Bloomberg maintains recruitment practices that comply with minimum legal working age requirements in each of the jurisdictions where we have operations, which minimizes the risk of child labour entering our workforce. Bloomberg respects human rights in line with the United Nations (UN) Guiding Principles on Business and Human Rights and all applicable laws concerning forced and child labour.

Bloomberg is also committed to supporting the mental and physical health of all employees. Bloomberg provides resources to eligible employees to care for their mental health and to ensure they stay healthy. Bloomberg also equips managers with the resources to appropriately support their team members.

3.2 In Our Supply Chain

Bloomberg considers the risk of forced and child labour existing within its first-tier suppliers domiciled in Canada, a country with low prevalence for modern slavery according to the Global Slavery Index¹, to be low. We recognize that where our suppliers are domiciled in jurisdictions where forced and child labour is more prevalent, this increases the inherent risks. We have taken a number of steps to reduce that risk.

¹ <https://www.globalslaveryindex.org/>

Globally, a large number of our first-tier suppliers are likely to rely on global supply chains for the provision of goods and/or services provided to us. We are aware that the risk of forced and child labour may be higher in relation to suppliers in certain locations from the following higher risk sectors and products:

- Cleaning services;
- Facilities management;
- Food and beverage, travel and hospitality;
- Office supplies;
- IT and telecommunications hardware;
- Promotional materials; and
- Logistics and transportation.

4. Actions to Address and Assess the Risk of Forced and Child Labour

4.1 In Our Operations

Bloomberg maintains policies and procedures applicable to the Reporting Entities that help to ensure that its employees are working of their own free will. These policies and procedures include passport and visa status checks to confirm that individuals have the rights to work. We obtain appropriate work authorisation for those who need them. All employees must also provide a tax file or similar number that is used to verify employees are of the minimum working age applicable to the laws of their jurisdiction.

The anti-slavery policy in Bloomberg's Global Resource and Information Core Guide (the **Guide**) requires employees to take responsibility for preventing, detecting, and reporting instances of modern slavery, including forced and child labour, in any part of Bloomberg's business or supply chains. The Guide, which is reviewed on an annual basis, requires employees to conduct themselves to the highest ethical standards.

Bloomberg's Whistleblowing Policies and Guide set out the process for employees to report concerns, including suspected breaches of the Guide. If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, the Guide requires that the employee escalate this information to their manager, Human Resources (**HR**), or through the anonymous Bloomberg Ethics Hotline. The Bloomberg Ethics Hotline includes modern slavery, which takes into account forced and child labour, as a separate reporting category. To encourage reporting by employees and third parties, Bloomberg has established systems that protect whistle-blowers from retaliation and detrimental treatment.

Bloomberg has a mandatory employee training requirement for certain employees on the topic of modern slavery. In the reporting period, a new and enhanced modern slavery e-learning training module was launched, which highlights the significance and risks of modern slavery and human trafficking, our employees' obligations in this context, how to report concerns, and the steps Bloomberg is taking to identify and mitigate the risk of modern slavery in our supply chains. The training includes a knowledge assessment and has been provided to any individuals identified as having potentially greater interaction with vendors/suppliers, including Media, Workplace Operations, Vendor Risk Management, Procurement, Travel and Expenses, Legal & Compliance, Human Resources, and News. The completion rate of this training is measured annually. For the reporting period, more than 99% of the target audience had successfully completed the training.

Additionally, as part of its training programme, Bloomberg requires all employees to undertake an annual review and attestation of policies relating to standards of conduct and ethical behaviour, including the Guide (see above). We are committed to maintaining these steps, which seek to ensure no forced or child labour exists in our supply chain or in any part of our business.

4.2 Our Supplier Code of Conduct

Bloomberg's Supplier Code of Conduct (the **Code**) requires our suppliers to commit to upholding the human rights of workers and treating them with dignity and respect. The Code outlines Bloomberg's expectations for supplier conduct regarding labour and human rights, health and safety, environmental protection, ethics, and management practices based on international standards.

The Code prohibits all forms of modern slavery both within its business operations and supply chains. Suppliers must comply with all applicable modern slavery and human trafficking laws, statutes, regulations and codes and not engage in any activity, practice or conduct that would constitute an offense under any applicable modern slavery laws or regulations in effect. The Code states Bloomberg's zero tolerance policy toward modern slavery in both its operations and supply chain.

Bloomberg's supplier contracts require suppliers to ensure full compliance with the Code and to comply with all laws, including those relating to forced and child labour, anti-slavery and human trafficking, anti-discrimination, work health and safety, authorisation to work, anti-bribery and conflict minerals. Although our service providers and suppliers manage their operations, we expect those in our supply chain to align with our values and operate in accordance with the principles of the Code (<https://www.bloomberg.com/procurement>), the Bloomberg Impact Report (<https://www.bloomberg.com/impact>), and in full compliance with all applicable laws and regulations.

4.3 Vendor Management

Bloomberg recognizes the risks inherent in working with vendors and takes a risk-based approach to managing vendor relationships. Bloomberg maintains and oversees a vendor management lifecycle framework to ensure that our approach to vendor management is supported by standards of high governance, which is documented in our Vendor Management Policy.

We are committed to enhancing our vendor management lifecycle framework to include vendor selection criteria based on the geographic risk of the location(s) from which the vendor provides services or products, which takes into consideration human rights and forced and child labour risk factors. This will enable us to identify products or services that may be produced in high-risk jurisdictions. Bloomberg currently screens some vendors for issues related to forced and slave labour, labour and human rights violations, exploitation of children, among others. Additionally, we engaged an NGO partner to provide guidance on incorporating Modern Slavery and other ESG considerations into our vendor due diligence process. Following this engagement, we have implemented a set of questions in 2024 to increase our understanding of vendor policies and practices related to modern slavery.

5. Assessing the Effectiveness of our Actions

Bloomberg's employees and third parties are encouraged to report incidents of forced and child labour to HR or through the Bloomberg Ethics Hotline, which is accessible 24 hours a day, 7 days a week, 365 days per year.

None of the Reporting Entities have identified any instance of forced or child labour in their operations or supply chain, or of vulnerable families that have experienced loss of income as a result of steps taken to eliminate forced or child labour risks.

Our Modern Slavery Statement Working Group, comprised of key stakeholders across Bloomberg, including our Chief Sustainability Officer, shares modern slavery risk guidance with accountable departments and supports the review of human rights and anti-modern slavery controls and processes. Some of the areas of focus include:

- Evaluating the scope of vendors for which we are currently conducting modern slavery assessments, and making the necessary adjustments to provide adequate vendor coverage;

- Reviewing the methodologies we are using to assess the risk of modern slavery (e.g., questionnaires and screening tools) and validating their effectiveness;
- Continuing to capture and track trends in indicative key data metrics such as percentage of employees that have completed Modern Slavery training; and
- Defining new key management information (KRI/KPIs) to report on data gathered through our assessments (e.g., percentage of vendor's performing services in geographies with higher risk of modern slavery, including forced and child labour).

6. Other Information

Bloomberg supports charitable institutions dedicated to combating modern slavery, including forced and child labour, and human trafficking. Overall, we work with more than 15,000 organizations worldwide, many of which aim to advance basic human rights including safety, education, and food security. At Bloomberg, we are committed to giving back to the cities in which we live and work, using the expertise of our employees and resources of our business to create lasting impact.

Our Corporate Philanthropy website at <https://www.bloomberg.com/philanthropy> provides further information about our charitable initiatives.

7. Approval and Attestation

Solely for purposes of compliance with the Act, this Statement was approved pursuant to subparagraph 11(4)(b)(i) of the Act by the appropriate governing body of BI.

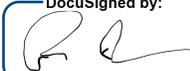
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Statement for BI. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Statement is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Patti Roskill

Director and Treasurer, Bloomberg Inc.

May 30, 2024

I have the authority to bind Bloomberg Inc.

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Solely for purposes of compliance with the Act, this Statement was approved pursuant to subparagraph 11(4)(b)(i) of the Act by the appropriate governing body of BLP.

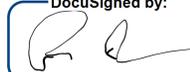
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Statement for BLP. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Statement is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Patti Roskill

Chief Financial Officer, Bloomberg L.P.

May 30, 2024

I have the authority to bind Bloomberg L.P.

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Solely for purposes of compliance with the Act, this Statement was approved pursuant to subparagraph 11(4)(b)(i) of the Act by the appropriate governing body of BFLP.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Statement for BFLP. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Statement is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Peter T. Grauer

Chairman, Bloomberg Finance L.P.

May 30, 2024

I have the authority to bind Bloomberg Finance L.P.

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