

Bloomberg – Australia Modern Slavery Statement

Published: June 30, 2025

1. Introduction

This Modern Slavery Statement (**Statement**) is made in accordance with the *Australian Modern Slavery Act 2018* (Cth) (the **Act**) for financial year ended 31 December 2024 on behalf of the following entities (collectively, the **Reporting Entities**):

- Bloomberg Australia Pty Ltd (ACN 622 777 851) (**BAPL**);
- Bloomberg Trading Facility Limited (ARBN 621 883 092) (**BTFL**),
- Bloomberg Trading Facility BV (ARBN 632 569 389) (**BTF BV**); and
- Bloomberg SEF LLC (ARBN 651 685 497) (**BSEF**).

Each of the Reporting Entities is a subsidiary of Bloomberg L.P. (**BLP**, and, together with its subsidiaries, including the Reporting Entities, **Bloomberg**) and is part of Bloomberg's global compliance and risk management program (as described throughout this Statement).¹

Forced and child labour, modern slavery, human trafficking and involuntary servitude (referred to collectively in this Statement as **Modern Slavery**) 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 of 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 on our website ([here](#)).

This Statement sets out the actions the Reporting Entities have taken, as part of Bloomberg's global compliance and risk management program, to assess and address Modern Slavery risks within their operations and supply chains pursuant to the Act.

2. Our Structure, Operations and Supply Chains

2.1. Our Structure and Operations

Bloomberg L.P. (BLP)

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 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.

¹ Please note that neither BLP nor any other Bloomberg entity other than the Reporting Entities are subject to reporting obligations under the Act for the 2024 reporting period.

Bloomberg Australia Pty Ltd (BAPL)

BAPL, a proprietary limited company formed under the laws of Australia with a branch registration in New Zealand, is the distributor of Bloomberg Professional Services in the Australia region.

BAPL's employees are all based in Australia and employed within the Financial Solutions News, Product, Data, Engineering, Finance & Administration and Human Resources functions. These employees are all highly qualified individuals. The majority of these employees are full-time permanent employees.

BAPL is a wholly-owned subsidiary of BLP. BAPL does not have an ownership interest in or control any other entities.

Bloomberg Trading Facility Limited (BTFL)

BTFL, a private limited company formed under the laws of England and Wales, and registered as a foreign company in Australia, is authorised by the UK's Financial Conduct Authority to operate a multilateral trading facility (**MTF**) and provides such services in Australia via its Australian market license from the Australian Securities and Investment Commission (**ASIC**). BTFL's MTF is a trading venue used by global institutions² for trading cash bonds, repos, credit default swaps, interest rate swaps, exchange-traded funds, equity derivatives and foreign exchange derivatives.

BTFL is a wholly-owned subsidiary of BLP. BTFL does not have an ownership interest in or control any other entities.

Bloomberg Trading Facility BV (BTF BV)

BTF BV, a private limited company formed under the laws of the Netherlands, and registered as a foreign company in Australia, is authorised and regulated by the Autoriteit Financiële Markten and the Dutch Central Bank to operate an MTF and provides such services in Australia via its Australian market license from the ASIC. BTF BV's MTF is a trading venue used by global institutions³ for trading cash bonds, repos, credit default swaps, interest rate swaps, exchange-traded funds, equity derivatives and foreign exchange derivatives.

BTF BV is a wholly-owned subsidiary of BLP. BTF BV does not have an ownership interest in or control any other entities.

Bloomberg SEF LLC (BSEF)

BSEF, a limited liability company formed under the laws of the State of Delaware in the United States, is registered with the U.S. Commodity Futures Trading Commission as a swap execution facility and provides such services in Australia via its Australian market license from the ASIC. BSEF is a trading venue used by global institutions for trading swaps in fixed income for interest rate swaps and credit default swaps as well as certain currency and commodity derivatives.

BSEF is a wholly-owned subsidiary of BLP. BSEF does not have an ownership interest in or control any other entities.

² Please note that certain financial instruments may not be available in all jurisdictions or to everyone.

³ Please note that certain financial instruments may not be available in all jurisdictions or to everyone.

2.2. Supply Chain

Bloomberg engages a mix of global 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 services;
- Information technology networks and equipment software providers;
- Warehousing, distribution and logistics;
- Human resources;
- Corporate and professional services;
- Media, marketing and events;
- Data services, equipment and asset lifecycle management; and
- Travel and hospitality.

The Reporting Entities are included within Bloomberg's supply chain.

3. Modern Slavery Risks in our Operations and Supply Chains

3.1. In Our Operations

We do not believe there is a meaningful risk of Modern Slavery in our own operations. In that regard, we are not a manufacturing company; our business activities focus on providing various news and information services, data, analytics and trading-related services and functionalities. Our workforce is primarily comprised of employees who work in professional, office-based roles and our hiring, compensation and employee relations practices are such that the risks of our employing workers under the legal age, or anyone against their will, are negligible.

3.2. In Our Supply Chain

Bloomberg believes the risk of Modern Slavery existing within our critical first-tier suppliers, based on the assessment that the majority of which are domiciled in countries with a low prevalence for Modern Slavery, according to the Global Slavery Index, is low. We recognize that where our suppliers are domiciled and/or providing services in jurisdictions where Modern Slavery is more prevalent, this increases the inherent risks in our supply chain. We have taken a number of steps to reduce that risk – please also see the section on our Vendor Risk Management processes below for more detail.

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 Modern Slavery may be higher in relation to suppliers in certain locations and/or industries, sectors or products, and we are developing new procedures to more effectively identify and manage risks across these

goods, services and jurisdictions. The products and services in our supply chain that we consider to have a higher risk of Modern Slavery include the following:

- 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 Modern Slavery

4.1. In Our Operations

We maintain policies and procedures applicable to the Reporting Entities that help to ensure that our employees are working of their own free will. These policies and procedures include passport and visa status checks to confirm that individuals have the right to work. Where required, we obtain appropriate work authorization for those who need them. All employees must also provide appropriate government-issued documentation to verify employees are of the minimum working age applicable to the laws of their jurisdiction.

The Modern Slavery policies in Bloomberg's Global Resource and Information Core Guide and Contingent Worker Policy Guide (together, the **Guides**) require employees and contingent workers, respectively, to take responsibility for preventing, detecting and reporting instances of Modern Slavery, in any part of our business or supply chains. The Guides, which are reviewed and updated on an annual basis, require staff to conduct themselves to the highest ethical standards.

The Guides set out the processes for employees and contingent workers, respectively, to report concerns, including suspected breaches of the Guides. If a staff member 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 Guides require that they escalate this information to their manager, Legal & Compliance, Human Resources (HR) or through the anonymous [Bloomberg Ethics Hotline](#), which is accessible 24 hours a day, 7 days a week, 365 days per year in multiple languages. To encourage reporting by employees, contingent workers and third parties, we have established systems that protect whistleblowers from retaliation and detrimental treatment.

We have employee training on the topic of Modern Slavery. The e-learning training module, launched in 2024, highlights the significance and risks of Modern Slavery, 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 is mandatory for personnel 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 98% of the mandatory audience successfully completed the training.

Additionally, as part of our training program, we require all employees to undertake an annual review and attestation of policies relating to standards of conduct and ethical behaviour, including the Global Resource and Information Core Guide. We require all contingent workers to review and attest to such policies applicable to them, as set forth in the Contingent Worker Policy Guide, at the time of engagement. We are committed to maintaining these steps, which are designed to mitigate the risks of Modern Slavery existing in our supply chain or in any part of our business.

4.2. Our Supplier Code of Conduct

The Bloomberg Supplier Code of Conduct (the **Code**) requires our suppliers to commit to uphold the human rights of workers and treat them with dignity and respect. The Code outlines expectations for our suppliers' 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 suppliers' business operations and supply chains. Suppliers must comply with all applicable Modern Slavery related 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. The Code states our zero tolerance policy toward Modern Slavery in both our operations and supply chain.

Our supplier contracts require suppliers to ensure full compliance with the Code and to comply with all applicable laws, including those relating to Modern Slavery, anti-discrimination, work health and safety, authorization to work, anti-bribery and conflict minerals. 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>) 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. We maintain and oversee 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 Modern Slavery risk factors. We are continuing to review and improve our processes and policies, as further described in this Statement.

5. Assessing the Effectiveness of our Actions

Bloomberg's employees and third parties are encouraged to report suspected incidents of Modern Slavery to their manager, Legal & Compliance, HR or through the anonymous [Bloomberg Ethics Hotline](#), which is accessible 24 hours a day, 7 days a week, 365 days per year in multiple languages. During the reporting period, none of the Reporting Entities has identified any instance of Modern Slavery in their operations or supply chain.

Areas of focus include:

- Continuing to evaluate the scope of vendors for which we are conducting Modern Slavery assessments and making the necessary adjustments to provide adequate coverage;
- Continuing to capture and track trends in indicative key data metrics, including percentage of employees that have completed our Modern Slavery training; and
- Monitoring key performance data gathered through our assessments to support the continuous enhancement of our processes.

6. Approval and Attestation

This Statement was prepared in consultation with stakeholders from multiple departments within Bloomberg including the Global Sustainability Office, Human Resources, Legal & Compliance, Supply Chain, Vendor Risk Management, Procurement, Finance and persons at the Reporting Entities. Stakeholders hold global and/or regional roles and were able to provide input in relation to the mandatory criteria for all the Reporting Entities.


Solely for purposes of the Act, and in accordance with Section 14(2)(d)(ii) of the Act, on behalf of the Reporting Entities, this Statement has been approved by the General Partner of Bloomberg L.P., as Bloomberg L.P.'s principal governing body, on June 26, 2025. Bloomberg L.P. is the parent entity of each of the Reporting Entities.

For and on behalf of the Reporting Entities:

Signed by:

Bloomberg L.P.

By: Bloomberg Inc., its general partner

Signed by:

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Name: Patti Roskill

Title: Director and Treasurer of Bloomberg Inc.

Date: June 26, 2025