Bloomberg Supplier Code of Conduct

Bloomberg Supplier Code of Conduct

Bloomberg Supplier Code of Conduct

Sustainability runs through everything we do at Bloomberg. Sustainability is at the core of the 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 they operate. In instances where this Code requires Suppliers to operate at a higher standard than what is required by local law, Bloomberg requires Suppliers and the Supply Chain to 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 as understood by the international community. 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 this 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 including, if applicable, workers’ dormitories or living quarters.

As part of the hiring process, all 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. Foreign migrant workers must receive the employment agreement prior to the worker departing from their country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker’s contract.

Employers, agents and sub-agents’ may not hold or otherwise destroy, conceal, confiscate identity or immigration documents, such as government-issued identification, passports or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers’ agents or sub-agents’ 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 anti-slavery and human trafficking provisions in their contracts with the Supply Chain 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). Suppliers shall implement an appropriate mechanism to verify the age of workers. 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
Working hours 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, violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming 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 or harassment 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. Workers shall be provided with reasonable accommodation for religious practices. 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 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 this 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 identify, assess and mitigate workers’ potential for exposure to health and safety hazards ((e.g., (chemical, electrical and other energy sources, fire, vehicles, and fall hazards) using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing occupational health and 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.
Reasonable steps must also be taken to remove pregnant women and nursing mothers from working conditions with high hazards, and to remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those risks associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

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. Supplier shall perform emergency drills at least annually or as required by local law, whichever is more stringent. Emergency plans must include appropriate fire detection and suppression equipment, clear and unobstructed egress, and adequate exit facilities, contact information for emergency responders, 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 according to the Hierarchy of Controls. If any potential hazards were identified, Suppliers shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards shall be controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, Suppliers shall be provided with and use appropriate, well-maintained personal protective equipment free of charge. Protective programs shall include educational materials about the risks associated with these hazards.

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 maintained to be clean and safe, and provide appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8) Health and Safety Communication and Training
Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Suppliers shall provide training to all workers prior to
the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns without retaliation.

C. ENVIRONMENTAL

Suppliers shall commit to identifying and 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 this 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


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 minimize or eliminate emissions and discharges of pollutants and generation of waste at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

3) Hazardous Substances
 Suppliers shall identify and manage any chemicals and other materials that if released to the environment would pose a hazard to humans or the environment and ensure the safe handling, movement, storage, use, recycling or reuse and disposal of such chemicals and other materials.

4) Solid Waste
 Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

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 in products and the supply chain, including labeling for recycling and disposal.
7) Water Management
Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8) Energy Consumption and Greenhouse Gas Emissions
Suppliers shall track and document energy consumption and all relevant Scopes 1 and 2 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) Anti-Bribery and Anti-Corruption
As set forth in our Global Anti-Bribery and Anti-Corruption (ABAC) Statement, Bloomberg strictly prohibits bribery and corruption in all jurisdictions in which we operate and holds third parties to the same standards.

Accordingly, Suppliers shall have a zero-tolerance policy for bribery and corruption in any form. Suppliers and anyone acting on their behalf must fully comply with all applicable anti-bribery and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act of 2010, as may be amended, and may not promise, offer, give, or accept any bribes or facilitation payments to/from any government official or other persons 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.

Suppliers must comply with Bloomberg's No Gift Policy which prohibits Suppliers from giving gifts to Bloomberg employees.

Suppliers shall maintain policies and procedures reasonably designed to ensure compliance with these requirements and expectations.

2) Excluded Jurisdictions
Suppliers shall not conduct activities in or provide, receive or use any services, goods, products, staff or other resources to, from, or that pass through, Crimea, Syria, Cuba, North Korea, or Iran (each, any of Excluded Jurisdictions). Suppliers shall not make payments to, or conduct any activity in connection with, or for the benefit of, an Excluded Jurisdiction.

3) Sanctions
Suppliers shall not provide, receive or use any services, goods, products, Workers or other resources: (i) in, or for the benefit of any country and/or region with respect to which the United Nations, the United States, European Union and/or United Kingdom (the “Sanctioning Authorities”) maintains sanctions prohibiting all or substantially all shipment or provision of services, goods, technology or software (a “Sanctioned Jurisdiction”); (ii) to, or for benefit of, the government of an Excluded Jurisdiction or a Sanctioned Jurisdiction or a person located in or normally resident of an Excluded Jurisdiction or a Sanctioned Jurisdiction; (iii) involving or benefiting a government or person whose assets a Sanctioning Authority has blocked or to which a Sanctioning Authority restricts the shipment or provision of services, goods, technology or software (a “Prohibited Party”); or (v) for any purpose that would be prohibited under the economic sanctions of any Sanctioning Authority, including, without limitation, for purposes relating to nuclear, chemical or biological weapons proliferation, terrorism, corruption, undermining of democratic rights and government, money laundering, tax evasion or human rights violations, or other similarly egregious activities.
If a Supplier becomes subject to any action of a Sanctioning Authority that blocks or otherwise prevents continuation of activity with respect to Bloomberg, the Supplier must immediately notify Bloomberg in writing and cease all such activity.

4) Anti-money Laundering and Non-facilitation of Tax Evasion
Bloomberg is committed to conducting business in accordance with the highest ethical standards and has a zero tolerance policy that prohibits money laundering and terrorist financing. Bloomberg establishes, implements and maintains policies and procedures reasonably designed to ensure compliance with all applicable Anti-Money Laundering ("AML") and Counter Terrorist Financing ("CTF") laws and regulations.

Suppliers shall: (i) not knowingly engage or attempt to engage in unlawful activity or facilitate or engage in the financial proceeds derived from such activity; (ii) where applicable, perform applicable AML/CTF related responsibilities and report to Bloomberg any matter suspected to be related to money laundering or terrorist financing that could impact Bloomberg and the services provided by Supplier; and (iii) not have dealings with individuals and entities appearing on any designated terrorist lists as published by a relevant competent authority and/or government.

Bloomberg has a zero tolerance policy that prohibits all forms of tax evasion Suppliers shall not facilitate or commit tax evasion.

5) Disclosure of Information
Suppliers shall perform all business activities and transactions transparently, accurately and fairly reflect such activities and transactions in its books and records in reasonable detail. Suppliers shall have internal accounting controls sufficient to provide reasonable assurances that it uses funds received from Bloomberg only as authorized for legitimate business purposes.

All invoices provided to Bloomberg shall be itemized and include sufficient detail and description regarding the services being provided, and any associated charges (including expenses). If requested by Bloomberg, Supplier shall submit receipts supporting the invoiced charges and expenses and shall complete certificates certifying compliance with the requirements set forth in this Code, including without limitation, to verify the country of origin of goods and services.

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.

Supplier shall immediately inform Bloomberg in writing upon change to Supplier's legal name.

6) 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.

7) Fair Business, Advertising and Competition
Suppliers shall uphold standards of fair business, advertising and competition and have appropriate means to safeguard customer information.

8) Protection of Identity and Non-retaliation
Suppliers shall provide a mechanism by which employees can anonymously and confidentiality 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.
9) Responsible Sourcing of Minerals
Suppliers shall attest that the items to be procured by Bloomberg 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.

10) 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.

11) Audits
Bloomberg or its designee shall have the right, at any time during the term of the engagement and for a period of five years thereafter, to audit, in person or otherwise, (i) Supplier’s financial and other books, records, and information and documentations relating to its performance under this engagement, and (ii) such documents as may be sufficient to show Supplier’s compliance program, including without limitation, its anti-corruption policies and procedures, its cash management practices, and other related policies.

E. MANAGEMENT SYSTEM
Suppliers shall adopt or establish a management system with a scope 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.

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. The policy statement shall be posted in the Suppliers’ facilities in the local language.

2) Management Accountability and Responsibility
Suppliers shall clearly identify senior executives and 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, including an effective grievance mechanism, 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 without fear of reprisal or retaliation.

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.

13) Bloomberg's Ethics Hotline is available to Suppliers to report any concerns. Reports can be made anonymously and the hotline is available 24 hours/7 days a week in multiple languages.

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 this Code is updated as needed to align with current industry practices and requirements.

1. Dodd-Frank Wall Street Reform and Consumer Protection Act
http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf


4. ILO Code of Practice in Safety and Health


8. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas


15. United States Federal Acquisition Regulation, [www.acquisition.gov/far/](http://www.acquisition.gov/far/)


17. Social Accountability International (SAI), [www.sa-intl.org](http://www.sa-intl.org)