BSI Operations Guidelines
2012-2013
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1. Introduction

1.1 Purpose

The purpose of this document is to detail the operational guidelines which the Bloomberg Sustainability Team in coordination with internal departments has jointly developed. The implicit purpose of these documents are to provide information within operating departments in order to reduce waste, improve efficiency, achieve carbon reduction goals and direct employees towards more sustainable/environmentally friendly operating procedures. Abiding by these guidelines will ensure that the firm achieves all its environmental goals and minimizes the environmental risk associated with our day to day operations. Over the past 3 years, Bloomberg has achieved over USD 25 million in cost savings to the firm, making the company more profitable, while preserving our reputation as a progressive and civic minded company. The Sustainability Team has developed a robust set of performance metrics against these guidelines which will be used to check progress and abidance on a quarterly basis as well as identifying areas of improvement.
2. Environmentally Preferred Purchasing Guidelines

2.1 Executive Summary

Bloomberg's sustainability strategy reduces costs, minimizes risk and enhances our reputation as a progressive company. The group’s mission is to help preserve and protect the environment in all of our business activities, as we work towards reducing our “Carbon Footprint”.

In efforts to assist the firm to achieve our sustainability goals, Purchasing has been called upon to introduce Environmentally Preferred Purchasing Guidelines. “Environmentally Preferred” purchasing means that buyers will need to take into consideration the impact of the products and services we procure and their effects on the environment and human health. Buyers will be called upon to make decisions and give preference to more environmentally friendly products and services when quality and cost performances are equal or superior to current purchases. These Environmentally Preferred Purchasing Guidelines are a formal set of goals and objectives that will be used to direct the implementation of our “Environmentally Preferred Purchasing” policy and procedures. Remember to be “Green” we need to: REDUCE, REUSE AND RECYCLE.

2.1.1 What makes a product or service “Environmentally Preferable”?

1. Green products and services reduce waste and resources; think recycled, recycling solutions, remanufactured, refilled, refillable, rechargeable and reusable.
2. Green products and services reduce energy consumption and carbon emissions.
3. Green products and services are typically accompanied by a Third Party Certification that verifies the claims of the manufacturer. Employees should utilize third party certifications to ease the decision making process when trying to identify environmentally friendly goods and services. Examples of 3rd part certifications are - Rainforest Alliance, Green Seal, Certified Organic, Energy Star, FSC Certified, etc. If there are any questions, about the viability of a 3rd Party Certification, please contact the Sustainability Department to assist in the verification of their claims.

2.1.2 Reasons to adopt an “Environmentally Preferred Purchasing Guideline”:

1. Procuring recycled, remanufactured and biodegradable products and services confirms Bloomberg’s commitment to the environment and the community.
2. Provides cost savings opportunities while saving the environment. Green procurement takes into consideration the cost of goods through its full life cycle from manufacturing to disposal. Incorporating these practices into the procurement process can significantly reduce operating costs.
3. Adopting “Environmentally Preferred” policies and procedures will encourage our suppliers to find and promote environmentally preferred products and services to Bloomberg as well as their other clients.
4. Recycled products can offer superior quality.
5. Recycling and “buying local” creates jobs and serves as a catalyst for new enterprises.
6. Through green buildings, water and energy efficiency and waste reduction, Bloomberg will be on its way to reducing our “Carbon Footprint” and associated environmental impact.
7. By introducing Bloomberg to environmentally preferable goods and services, we can influence our employees, our clients and the public in their decision making processes to also be “Sustainable”.

Purchasing may be asked to obtain “Environmentally Preferred” information from vendors about their products and services. Some key areas of concern will be:

- Information on a vendor’s sustainability program, goals and initiatives
- Greenhouse Gas and Conservation Initiatives

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• Products & services with a focus on sustainability
• Manufacturing Processes

Bloomberg has already begun implementing some green procurement measures, and by implementing these practices in a uniform manner globally Bloomberg can receive recognition for our efforts.

2.1.3 Guideline Specifications

Bloomberg LP acknowledges the value of purchasing environmentally preferable products and services when possible and has adopted the specifications within as our Environmentally Preferable Purchasing Guideline Policy. Our firm is committed to purchasing products and services that meet the criteria specified. While Bloomberg acknowledges that it is not realistic to expect all purchases to be environmentally preferable, it is a value to purchase such materials and services, when available.

The Bloomberg Environmentally Preferable Purchasing (EPP) Guideline relates to any purchases made by Bloomberg employees, parties purchasing materials or services on Bloomberg’s behalf and/or companies contracted to provide goods or services to Bloomberg.

Bloomberg will give priority consideration to all products and services that meet and/or vendors who supply any environmentally preferable materials or services.

Bloomberg is committed to its sustainability initiatives and as Buyers it is our responsibility to communicate the “Environmentally Preferable” Purchasing Guideline. Using the information contained within this EPP Guideline, Buyers should be able to ask the appropriate questions and obtain the necessary information to make “educated” decisions, procuring sustainable goods and services.

2.1.3.1 Here are some basic tips to assist you with the decision making process:

1. Buying “Environmentally Preferable” should be cost effective. If you can procure “Green” goods or services without any financial impact, buy “Green”.
2. If “Environmentally Preferable” goods or services can be procured for a premium of 5% or less of the non-green option, the GREEN option should be suggested to the end user and highlighted as a justifiable business decision. A monthly recap will be provided to the GREEN Team on all opportunities presented and accepted or rejected by the end users.
3. If a strong case can be made for procuring GREEN goods/services at a premium over 5% and the end user endorses the purchase, Purchasing, the Sustainability team and the end user should work together on the VALUE that GREEN will provide the Company in this specific case. Thereby enabling the end user to present the rationale to upper management.
4. The Purchasing Department will endeavor to support the Sustainability team (GREEN team) by including GREEN options when possible for evaluation by the end user.
5. Wherever possible, Purchasing will identify commonly purchased items across the firm and ensure that if a GREEN option which complies with the above financial parameters exists, that item is set as the default procurement choice.

2.1.3.2 Other criteria to be considered to procure “Environmentally Preferable” are as follows:

1. Bloomberg should never compromise quality or service to procure “Environmentally Preferable”.
2. If the return on investment (ROI) for the “Environmentally Preferable” goods or services is less than 5 years, buy “Green”. As a general rule, payback should be within a 3-5 year period of time if you are paying any premiums for “Environmentally Preferable”.

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3. If the supplier offers a Take-back or Buy Back program, this should be taken into consideration. What would the disposal cost to Bloomberg be at the end of life? Asset Management can assist Purchasing with assessing these costs, as they may justify paying a premium at the time of purchase. To inquire about disposal costs for old merchandise please enter an SCHD <GO> ticket.

4. Are the goods manufactured in a way that minimizes environmental impact? Are the services performed in a “Sustainable” manner? This information will be provided in the supplier’s response to Bloomberg’s Vendor Environmental Performance Survey.

5. Transportation can greatly impact carbon emissions and defeat the good of procuring “environmentally preferred” products and services. Ask the vendor where the goods are shipped from and whether or not there is an opportunity to procure the goods from a location closer to the final destination or office.

6. Are goods packaged using environmentally friendly materials?

The information noted below is a guide to assist you with the procuring of “Environmentally Preferred” goods and services and to develop your Scope of Work/Specifications, so that when you request proposals you can obtain the appropriate information. As a note, some of this information may have been previously supplied by vendors via the Vendor Environmental Performance Survey, please become familiar with it.

General
- Find out if the supplier’s firm is included in a Sustainability Index: i.e. Dow Jones Sustainability Index.
- Does the supplier’s firm provide environmental educational programs for customers? If so are they local or regional? Is the program global? Can clients participate?
- Does supplier’s firm support Donation programs? (Example: Dell collects used PCs for the National Cristina Foundation and Goodwill Industries. www.reconnectpartnership.com)
- Suppliers should meet and maintain ISO 14001 and OHSAS 18001 standards.
- Verification by industry related third parties such as Energy Star, LEED, Green Seal, or EPA’s Comprehensive Procurement Guidelines (CPG) and/or equal.
- Vendors must be able to supply Bloomberg with documentation to substantiate what makes their goods or services “Sustainable”.

2.1.4 Recycled Content:

Purchasing should request that all vendors provide recycled content options for goods when available. If a product is available with recycled content, vendor should disclose that option and Purchasing will relay the option to the end user.

If a product is available with recycled content, but BLP does not specify such, vendor should default to order the product with recycled content, unless instructed otherwise by BLP personnel.

2.2 Category Considerations

Environmental considerations should become part of normal purchasing practice, consistent with such traditional factors as product safety, price, performance and availability. From cradle to grave, the manufacturing process of a green product should incorporate processes that positively impact the triple bottom line: the environmental, social and economic consequences. Specifying environmentally preferable and energy-efficient products and services is the responsibility of each buyer.

Below are industry related criteria to assist buyers with obtaining environmentally preferred information and to develop specifications and SOWs for the goods and services we procure.

2.2.1 Product Life Cycle

Products go thru 4 distinct phases - design, manufacture, operation and disposal. Buyers should take into account all four of these milestones during the life of a product before making a purchasing decision.
• Design - The least resource intensive stage of the product life cycle, but perhaps the most important. Designers of products should take into account the full environmental impact of an item throughout the next three phases of the item's life such as energy efficiency, material composition and raw material resource consumption. Strong design will limit the environmental impact of goods throughout all phases of the life cycle.

• Manufacture - Bloomberg should seek to have procured products manufactured in ISO14001 or ISO9001 compliant manufacturing facilities. Buyers should ask vendors how the company manages its waste flow and ensures that the products are built in an energy efficient manner. If the company has any LEED office space this is also an indication of environmental stewardship. Bloomberg's "Supplier Protocol of Ethical Behavior" states that we should refrain from dealing with any companies that employ child labor or have a poor record of social behavior.

• Operation - Final products should operate in the most efficient manner possible, producing the least amount of energy and waste when compared to other products. The products we purchase should carry one or many reputable Third Party Certifications.

• Disposal - It is important to think about the final disposition of any products that Bloomberg purchases. The longest life of many products is where they come to their final resting place. Wherever possible, Bloomberg should prioritize products that can be recycled or reused and vendors that have a take-back option.

2.2.2 Engineering Hardware, Electronic Products and Appliances

• Reduced Greenhouse gas emissions from product use
• Reduce emissions from delivery of products.
• Regional manufacturing or assembly plants.
• Reduced power consumption during useful life.
  - Look for the Energy Star or Energy Smart designations.
• PCs, Notebooks and other equipment should contain power management settings
• Products should contain non-brominated flame retardants (BFR). Note some companies are in the process of phasing out brominates, so inquire as to when the non-brominate products will be released.
• Products should not contain parts made with Polyvinyl Chloride (PVC).
• Equipment meets RoHS (made without Hazardous Substances like lead, which can be harmful to the environment.)
• Manufacturer reduces the amount of waste from the manufacturing process or recycles percentage of waste.
• Vendors that accept returns of printers, ink and toner with new purchases.
  - Bloomberg should consider purchasing remanufactured toner cartridges when procuring ink
• Asset Recovery Services (ARS) Commercial Asset Recovery Program.

2.2.2.1 Energy Star

In order to improve the energy efficiency of our inventory, high value products such as: computers, monitors, copiers, printers, scanners, fax machines, refrigerators and other appliances shall meet the criteria noted below. It is BLP's intent that 90% of the cost of purchases will meet these criteria.

• ENERGY STAR products, when available
• Electronic Product Environmental Assessment Tools (EPEAT) bronze level, or higher, rated products

Please refer to section 12 for a full explanation of our Energy Star Guidelines
2.2.3 Paper Products/Forest Stewardship

- Specify and use paper, envelopes and forms that include a minimum of 10% post-consumer recycled content and a minimum of 20% total recycled content (pre-consumer and post-consumer). Paper Post Consumer Fibers and processed chlorine-Free (PCF) paper are preferred.
- Use forest-friendly paper including post-consumer recycled content and Forrest Stewardship Council (FSC) certified fiber for office supplies and encourage suppliers to do the same.
- Reduce packaging materials. Use forest-friendly packaging materials and reduce the use of foam, plastic and wood pallets.
- Increase sourcing of forest friendly paper and reduce the use of virgin tree fiber in packaging and office paper.
- Packaging should consist of the highest amount of recycled content available that does not jeopardize the product during shipment
- Reuse packaging wherever & whenever possible
- Use Corrugated Pallets
- Green CellTM foam products and packaging which is biodegradable foam made from high-grade cornstarch and soybean oil should be used.
- The acceptable range for mailing boxes, tubes, envelopes and void fill that contain a percentage of recycled material in the core product is 10% to 100% for post-consumer recycled content and 50% to 100% for total recycled content (pre-consumer plus post-consumer).
- The acceptable range for paper towels and tissues that contain a percentage of recycled paper material is 10% to 100% for post-consumer recycled content and 20% to 100% for total recycled content (pre-consumer plus post-consumer). Recycled towels and tissues are environmentally preferable since they help to reduce waste, decrease pressure on forests and lessen energy, greenhouse gases and water and air emissions.

BLP desires to reduce waste and recognizes that such reduction begins by mitigating the amount of material that enters each facility. BLP will request that all items purchased be packaged and delivered with minimal packaging material. BLP reserves the right to request that vendors alter the packaging of goods delivered, when appropriate and/or possible.

2.2.4 Plastics

The acceptable range for mailing boxes, tubes and envelopes that contain a percentage of recycled plastic material in the core product is 10% to 100% for post-consumer recycled content and 50% to 100% for total recycled content (pre-consumer plus post-consumer).

2.2.5 Cleaning Supplies

Specify cleaning supplies that are Non-Toxic and Biodegradable. Non-toxic cleaning supplies do not contain chemicals in sufficient quantities to be injurious to human health. Biodegradable cleaners safely break down in nature and do not cause environmental issues in ground or surface water. Refer to Section 8 of these guidelines for the more comprehensive Green Cleaning Policy, for additional information.

2.2.6 Lighting

- Specify Lamps that are energy efficient. The preferred specification should contain an Energy Star certification, though only CFLs and LEDs at this time are classified under the Energy Star labeling program.
  - Energy Star qualified Compact Fluorescents Light bulbs (CFLs) can save up to 75% of energy costs when compared to standard incandescent bulbs, and can last between 10 and 13 times as long as incandescent bulbs. Although upfront costs may be higher, CFLs pay for themselves over and over again.
- Office lighting that is linear fluorescent is typically the highest efficient lighting available for office spaces

2.2.6.1 Sustainable Purchasing of Light Bulbs With Reduced Mercury
LEED EB v2008 MRc4 specifies a building average mercury content of no more than 70 pg/lumen-hour (or 50 pg/lumen-hour for exemplary performance). This is calculated by dividing the bulb mercury content (in pictograms) by the bulb light output at 40% life (often called the design or mean lumens) and by the rated bulb life (in hours), resulting in a mercury content in pictograms per lumen-hour.

All lamps and light bulbs purchased by BLP for their facilities will comply with the minimum level of mercury possible in the marketplace.

2.2.7 Product Stewardship

- Manufacturers should offer no-charge recycling of their products or other recycling programs.
- Manufacturer should have a product recovery program, to decommission obsolete equipment.
- End of life product disposition

2.2.8 Furniture and Furnishings

Sustainable Purchasing of Furniture:
When purchasing new furniture, BLP will look for items with the following characteristics: FSC certified wood, recycled or rapidly renewable resource content, no added urea formaldehyde, manufactured locally and packaged with minimal material. It is BLP goal that 30% of all furniture purchases meet the following specifications. Please refer to BLP’s Construction Policy for additional information.

- All furniture products should contain recycled content. The acceptable range for furniture manufactured from post consumer steel and plastic is 30% to 100% for post-consumer recycled content and 50% to 100% for total recycled content (pre-consumer plus post-consumer).
- Desk accessories should be made of recycled materials. The acceptable range for plastic desk accessories such as pencil cups, magazine files and telephone stands, is that they contain 25%-100% post-consumer recycled content and 50%-100% total recycled content (pre-consumer plus post-consumer). The acceptable range for steel or metal desk accessories is that they contain 10%-100% post-consumer recycled content and 25%-100% total recycled content (pre-consumer plus post-consumer).
- BLP will purchase salvaged, refurbished or used furniture for their facilities when ever feasible.
- GreenGuard certified furniture is preferable.

2.2.9 Signage

- LEDs are environmentally preferable since they are extremely efficient, use significantly less energy and help reduce greenhouse gases in comparison to neon.

2.2.10 Art Supplies

- Pencils, Crayons and Paints are to be specified as Certified AP Non-Toxic, as they contain fewer harsh chemicals than non-certified products.

2.2.11 Sustainable purchasing of Facility Alterations and Additions

- Requirement per LEED EB v2008 MRc3
  Please see the BLP Construction Policy for specifications pertaining to the Construction Policy.

2.2.12 Sustainable Food Purchasing

- Requirement per LEED EB v2008 MRc5
  o LEED-EB recommends the purchase of food grown within a 100-mile radius of the site and the use of the following certification systems, all where possible:
    - USDA Certified Organic,
- Food Alliance Certified. Rainforest Alliance Certified,
- Protected Harvest Certified,
- Fair Trade,
- Marine Stewardship Council’s Eco-Label.
  o Bloomberg recognizes the challenges associated with this standard with respect to local food procurement.
  Thus, we have agreed to the following definitions of local for the following offices
  - NY, NJ - Northeastern US
  - Washington D.C. - Maryland, Virginia, Delaware
  - San Francisco - Northern California
  - Brazil - Domestic purchases
  - London - United Kingdom
  - Germany - Domestic Purchases
  - Tokyo - Domestic Purchases
  - Hong Kong - Hong Kong Purchases
  - Singapore - Domestic Purchases
  - Sydney - Domestic Purchases

2.2.13 Premium Items

Premiums are a highly visible way for Bloomberg to show clients and partner our commitment to sustainability. Purchasing should encourage end users to reconsider distributing premium items. When premium items are necessary to meet business objectives, they must meet the guidelines specified for environmentally preferred products and services described in section 2.1.3.1 and 2.1.3.2. Additional recommendations that Purchasing can make to the end user for choosing appropriate premium items include:

- Choose **locally produced goods**.
- **Avoid dated items** that must be discarded and opt for those that can be reused often.
- **Be conservative** in the quantity ordered.
- Choose lightweight goods and **shipping methods that minimize environmental impact** (ground vs. air)
3. Sustainable Electronics Manufacturing Policy

3.1 Executive Summary

Sustainable Electronic Product Manufacturing describes the practice of designing, producing and distributing electronic products that incorporate environmentally responsible materials and practices into such products. Sustainable Electronic Products should also draw the minimum amount of power from the energy grid necessary to support the product. The manufacturer & designers responsibility is to take into account the environment throughout the entire lifecycle of the product - from material selection, to production, to recycling and disposal. These guidelines identify 4 specific areas in which sustainability will be incorporated into the product:

1) Chemical & Toxics Reduction/Materials Selection
2) E-Waste Criteria (recycling)
3) Energy Criteria
4) Product Longevity/Design for End of Life

Bloomberg will ensure that we are compliant with ROHS and IEEE 1608 (through EPEAT) in all our products while ensuring that we are up to date with all progressive environmental guidelines, restrictions and legislation.

RoHS – The RoHS directive stands for “the restriction of the use of certain hazardous substances in electrical and electronic equipment”. This directive bans the placing in the EU market of new electrical and electronic equipment containing more than agreed levels of lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyl (PBB), and polybrominated diphenyl ether (PBDE) flame retardants. While only directed in the EU, all Bloomberg products, regardless of region comply with RoHS.

EPEAT – A procurement tool designed to help institutional purchasers in the public and private sectors evaluate, compare and select desktop computers, notebook computers and monitors based on their environmental attributes. At the same time it helps manufacturers promote environmentally preferable products. EPEAT is the implementation of the IEEE 1608 Standard for Environmental Assessment of Personal Computer products. There are 3 levels of certification – Bronze, Silver & Gold (See Exhibit 1). All Bloomberg proprietary equipment will be built to Gold specifications.

IEEE 1608 - Published by the Institute of Electrical and Electronics Engineers (IEEE) as publication 1608. This specification covers 23 criteria in 8 general categories. They are (1) Reduction/elimination of environmentally sensitive materials (2) Materials Selection (3) Design for end of life (4) Product longevity/life cycle extension (5) Energy Conservation (6) End of life management (7) Corporate performance (8) Packaging. Currently, 1608 is a specification with the intention of guiding businesses and designers in creating environmentally responsible products. There is no enforcement governing this specification.

Management Practices - Bloomberg contracts with electronic assemblers to build our Flat Panel, Keyboard and b-Unit products. The contracted assemblers procure the raw materials, individual components and subassemblies to Bloomberg’s specification or receive such items from Bloomberg. By contract, and in some cases by Law, the contract assembler cannot substitute or deviate from our supplied specification of acceptable materials and components. This specification is called a Bill of Materials or BOM.

By controlling the BOM, we diminish our environmental impact by specifying to the extent practicable eco-friendly materials. By choosing and contracting with reputable manufacturers, we can impose green manufacturing practices as part of our manufacturing agreement.

Measurement Practices – Bloomberg will score all of its proprietary products and evaluate the impact on the environment using a scorecard similar to the scorecard used by Green Peace in order to compare its products to those found within the industry.
3.2 Chemical & Toxics Reduction/Materials Selection

Bloomberg will abide by the precautionary principle, as promoted by Green Peace, outlined in a number of international treaties, conventions, & political declarations. The precautionary principle means that when (on the basis of available evidence) the use of a chemical or groups of chemicals may harm human health or the environment, action to eliminate the use of the chemical(s) will be taken – even if the full extent of harm has not yet been fully established scientifically.

Bloomberg will take every possible effort to ensure that all proprietary branded products are designed without toxic components, chemicals or elements in the product composition or manufacturing process. These chemicals include but are not limited to:
- PVC, BFR, all phthalates, beryllium (including alloys & compounds), antimony & antimony compounds
- Additionally, Bloomberg will work to eliminate all chrome 1 from its products and replace it with a less environmentally harmful material.

Bloomberg will continue to adhere to the following standards:

3.2.1 RoHS – Restriction of Hazardous Substances Directive

The RoHS Directive stands for "the restriction of the use of certain hazardous substances in electrical and electronic equipment". This Directive bans the placing in the EU market of new electrical and electronic equipment containing more than agreed levels of the following toxic substances:
- Cadmium (Cd) <100ppm
- Lead (Pb) <1000ppm
- Mercury (Hg) <1000ppm
- Hexavalent chromium <1000ppm
- Polybrominated biphenyl (PBB) <1000ppm (Flame Retardant)
- Polybrominated diphenyl ether (PBDE) <1000ppm (Flame Retardant)

The RoHS Directive and the UK RoHS regulations came into force on July 1, 2006. RoHS applies to all 25 EU countries. Other countries and regions have adopted similar legislation (e.g., China RoHS, Korea RoHS and California “Green Chemistry”).

3.2.2 IEEE1608 and EPEAT

The RoHS Directive and UK RoHS regulations are included as part of an umbrella specification published by the Institute of Electrical and Electronics Engineers (IEEE) as publication 1608. This specification covers 23 criteria in 8 general categories. Currently, 1608 is a specification with the intention of guiding businesses and designers in creating environmentally responsible products. There is no enforcement governing this specification.

The EPEAT tool further enhances the protection of RoHS by completely eliminating the allowable trace amounts of toxic materials. Under EPEAT, this complete elimination awards a higher level of certification.

3.2.2.1 EPEAT Related Specifications

EPEAT Related Directives (the following directives from EPEAT relate to Reduction/Elimination of Environmentally Sensitive Materials & Materials Selection.)

1 Chrome - The EPA has found chromium to potentially cause skin irritation and ulceration during short-term exposures. Long-term effects include damage to the liver, kidneys, circulatory system and nerve tissue, as well as skin damage and cancer. The chrome plating process creates waste which seeps into the water system or ends up in landfills as a toxin.
4.1 – Reduction/elimination of environmentally sensitive materials
4.1.1.1 – Compliance with provisions of European RoHS Directive upon its effective date
4.1.2.1 – Elimination of intentionally added cadmium
4.1.3.1 – Reporting on amount of mercury used in light sources
4.1.3.2 – Low threshold for amount of mercury used in light sources
4.1.3.3 – Elimination of intentionally added mercury used in light sources
4.1.4.1 – Elimination of added lead in certain applications
4.1.5.1 – Elimination of added hexavalent chromium
4.1.6.1 – Elimination of added SCCP flame retardents and plasticizers in certain applications
4.1.6.2 – Large plastic parts free of certain flame retardants classified under European Council Directives 67/548/EEC
4.1.7.1 – Batteries free of lead, cadmium and mercury
4.1.8.1 – Large plastic parts free of PVC

4.2 – Materials Selection
4.2.1.1 – Declaration of postconsumer recycled plastic content (%)
4.2.2.2 – Minimum content of postconsumer recycled plastic
4.2.1.3 – Higher content of postconsumer recycled plastic
4.2.2.1 – Declaration of renewable, Bio-based plastic materials content (%)
4.2.2.2 – Minimum content of renewable/bio-based plastic material
4.2.3.1 – Declaration of product weight (lbs)

3.3 E-Waste Criteria (recycling)

Bloomberg will take back discarded products in all countries in which the Bloomberg branded products have been sold or leased. Additionally, we will try to re-use as much equipment as possible before disposing.

3.3.1 Individual Producer Responsibility

- Individual producer responsibility – Bloomberg will take sole responsibility for all its products
- Voluntary take-back – Bloomberg will commit to taking back products even in countries/states where there are no laws requiring it to do so.

3.3.2 Resale/Trade-in/Disposal of Bloomberg IT and Other Assets

When Bloomberg has determined that certain assets are no longer needed, they are resold, traded-in, or scrapped. The Asset Management department is responsible for maximizing the value of these assets while keeping our Green initiative in mind.

- Resale – We sell directly to third-party dealers the following: No longer needed and obsolete Data Center IT, Broadcast, Hi-Tech equipment and returned Customer equipment (PCs and the LCD glass from outdated flat panels).
- Trade-in – When possible, we trade in obsolete equipment for credit towards new purchases.
- Scrap/Disposal – We have a longstanding relationship and contract with SMT Corp., an electronic equipment scraper, to whom we regularly send equipment for resale, dismantling, recycling and/or disposal. The main benefit of our relationship with SMT is that they dismantle our Flat Panels, test/resell the LCD glass, and finally dispose of the e-waste in an environmentally sound way. SMT is an EPA registered e-scrap recycler and is ISO 14001, OHSAS 18001, and ISO 9001 compliant. See Exhibit 3 for a sample agreement relating to the processing and resale of equipment. Please contact the Bloomberg legal department for the most current version of this agreement.
3.3.3 **WEEE – Waste Electrical and Electronic Equipment**

This EU legislation took effect in 2002. It requires that manufacturers be responsible for disposal of their electronic devices at their end-of-life. Bloomberg attempts to recover all unusable equipment and recycle/reuse the components through certified equipment recyclers. All manufacturers contracted by Bloomberg must meet WEEE requirements for hazardous waste disposal throughout the production process. The following are examples of these requirements:

- Information to individual customers – Bloomberg must provide easily accessible information to individual customers on what to do with their branded, discarded electronics in every country where its products are sold or leased
- Amounts recycled – Bloomberg must report on the amount of materials recycled and diverted from landfills

In order of importance we would like those within Bloomberg who handle e-waste to meet one or more of the following criteria.

1. **Sign Basel Ban** - The Basel Action Network provides a list of recyclers who have pledged to recycle domestically and to follow environmental guidelines. The following websites provide further information:
   - [http://www.ban.org/index.html](http://www.ban.org/index.html)
   - [http://www.ban.org/pledge1.html](http://www.ban.org/pledge1.html)

2. **ISO 14001 Standard** - The ISO 14001 standard requires that a community or organization put in place and implement a series of practices and procedures that, when taken together, result in an environmental management system. The major requirements of an EMS under ISO 14001 include, a policy statement which includes commitments to prevention of pollution, continual improvement of the EMS leading to improvements in overall environmental performance, and compliance with all applicable statutory and regulatory requirements.

3. **Receive IDC G.R.A.D.E Certification** - IDC is the premier global provider of market intelligence, advisory services, and events for the information technology, telecommunications, and consumer technology markets. It is based on 34 IT Asset Disposal (ITAD)-related functions and tasks that use a multi-dimensional weighting system which incorporates the broad offerings of remote applications, onsite services, logistics, in-plant processing and post treatment. IDC helps IT professionals, business executives, and the investment communities make fact-based decisions on technology purchases and business strategy. More than 1000 IDC analysts provide global, regional, and local expertise on technology and industry opportunities and trends in over 110 countries worldwide. Certification criteria cover manufacturing processes and end-of-use practices, including managing disposition of IT equipment in an environmentally sound fashion and helping customers safeguard proprietary information.


3.3.4 **E-waste Best Practices**

- Do you follow any recognized best management practices for electronics recyclers? Who certifies and audits your management system? Are you legally able to perform the work you claim?
- Recyclers and consolidators should be able to produce evidence that they have the proper facilities, training and equipment to perform the operations they claim by showing you an audited management/operations system, complete with evidence of recent audits.
- Ask if they have environmental management certification or system in place, such as ISO 14001 environmental management certification, or certifications by organizations like the International Association of Electronics Recyclers (IAER) or the Institute of Scrap Recycling Industries (ISRI). (or EPA R2)


3.3.4.1 **EPEAT Related Specifications**

4.6 – End of Life Management
4.6.1.1 – Provisions of product take-back service
4.6.1.2 – Auditing of recycling vendors]
4.6.2.1 – Provision of rechargeable battery take-back service

3.4 Energy Criteria

Bloomberg supports the global reduction of greenhouse gases emissions via reduced energy consumption. We are committed to developing products that are Energy Star standard or better.

3.4.1 Energy Star (Department of Energy)

Bloomberg will abide by Energy Star standards for its monitors. Computer monitors must meet stringent requirements in On, Sleep, and Off Modes in order to earn the Energy Star logo:
- In On Mode, the maximum allowed power varies based on the computer monitor’s resolution
- In Sleep mode, the computer monitor model must consume 2 watts or less
- In Off Mode, computer monitor models must consume 1 watt or less

3.4.2 EPEAT Related Specifications

4.5 – Energy Conservation
4.5.1.1 – ENERGY STAR ®
4.5.1.2 – Early adoption of new ENERGY STAR® specification
4.5.2.1 – Renewable Energy accessory available
4.5.2.2 – Renewable energy accessory standard

3.5 Product Longevity/Design for End of Life

Bloomberg understands that the longer a product can avoid replacement, the less material will be needed to produce new products. Bloomberg owns and maintains all Keyboards, Flat Panels and bUnits that we manufacture. Units are returned to our manufacturers, refurbished, and redistributed to customers. Flat Panels and Keyboard products will be designed to optimize refurbishment. They will continue to be designed for modularity, with high-wear components easily and inexpensively replaced. Keyboards and b-units that are unused will be tested and redistributed if they pass functional tests and cosmetic inspection criteria. The Bloomberg Sustainability Team (BSI) and Engineering will work together on an annual basis to establish longevity goals and metrics as it relates to Bloomberg branded products during the fiscal planning session or as the business requires.

3.5.1 EPEAT Related Specifications

4.3 - Design for End of Life
4.3.1.1 – Identification of materials with special handling needs
4.3.1.2 – Elimination of paints or coatings that are not compatible with recycling or reuse
4.3.1.3 – Easy disassembly of external enclosure
4.3.1.4 – Marking of plastic components
4.3.1.5 – Identification and removal of components containing hazardous materials
4.3.1.6 – Reduced number of plastic material types
4.3.1.7 – Molded/glued in metal eliminated or removable
4.3.1.8 – Minimum 65 percent reusable/recyclable
4.3.1.9 – Minimum 90 percent reusable/recyclable
4.3.2.1 – Manual separation of plastics
4.3.2.2 – Marking of plastics
4.4 – Product longevity/life cycle extension
4.4.1.1 – Availability of additional 3 year warranty or service agreement
4.4.2.1 – Upgradeable with common tools
4.4.2.2 – Modular design
4.4.3.1 – Availability of replacement parts
4. Corporate Green Design Policy:

4.1 Executive Summary

Sustainable design considers the environmental impacts of products (such as packaging, printed materials, publications, etc.) throughout a life cycle that includes: raw material; transformation; manufacturing; transportation; use; and disposal. Techniques for sustainable graphic design include: reducing the amount of materials required for production; the selection of safe and sustainably produced materials and inks; and using production and distribution methods that require the least amount of transport.

4.2 Guidelines

The following will serve as a guide to ensure all Marketing projects are created in the most sustainable way possible. There are times, however, when Marketing may not be able to go with the eco-friendly alternative. All sustainable options will be examined before a non-eco friendly option is chosen:

- **All projects** should be examined for the most sustainable option of production before design is started. The designer should start the project with the mindset of having it be as sustainable as possible. The MACS ticket should log the steps taken to make the project as sustainable as possible.
- **Avoid use of metallic or fluorescent ink.** If an environmentally harmful ink is selected, a reason is required to explain the use. We understand that there are projects that will require special non eco-friendly ink(s) in order to achieve the project’s objective.
- **Paper Sourcing**
  - The decision hierarchy for procuring paper should be as follows
    - Recycled paper from Post-Consumer Waste
    - Recycled paper from Pre-Consumer Waste
    - FSC Certified Paper
    
      **Paper that contains recycled content AND is from FSC certified sources is optimal**

    - **Recycled paper should have at least 30% Post (or Pre) Consumer Waste** and if you must use virgin pulp paper ensure that it comes from FSC certified sources.
    - **Use standard paper sizes and standard die cutting options.** We understand that there are projects that will require atypical paper sizes and die-cutting, in order to achieve the project’s objective. In the design process, take all steps necessary to make the most use of the space you have and eliminate waste. Use the **optimum sizes** for your layout of documents given the press size.
    - **Select the most eco-friendly paper possible:** Paper that is "processed chlorine free" for post industrial recycled content, post consumer recycled content, FSC certified, recycled fabric content, or tree-free paper (i.e. Kenaf or Hemp)

- When Bloomberg Ink is not printing the project, **source local printing first**, depending on availability and efficiency, to ensure that the project is printed or produced close to the area of ultimate distribution. Also try and take into account if the designer or paper mill utilizes renewable energy in their production process.
- **Try to reuse materials (paper and ink) from previous jobs.**
- **Minimize and/or eliminate unnecessary packaging** at all possible times.
- Design pieces to be **multi-functional and reusable** whenever the opportunities exist.
- Source materials that take into account the **full life cycle of the end product**, i.e. whether or not the end product can be recycled, bio-degrade, compose etc.
- Look for opportunities to **replace or alternate print projects with interactive (web) projects** and/or create in a way that allows for a longer shelf-life.
5. 3rd Party Printer Guidelines

5.1 Executive Summary

Bloomberg should be actively engaging companies that have made a commitment to be proactive when it comes to health, safety, and environmental responsibility. Identifying environmentally conscious print vendors will reduce the impact that Bloomberg has via its extended network of suppliers.

5.2 Checklist

The list below should serve as a checklist of requirements that Bloomberg needs to request from its external print vendors:

- When outsourcing print jobs and Marketing is NOT involved, specify paper (in this order):
  - with a MINIMUM of 30% PCW (Post Consumer Waste)
  - with a MINIMUM of 30% PreCW (Pre-Consumer Waste)
  - FSC Certified (can contain recycled content and be FSC Certified)
  - and for recycled white paper, “process chlorine free” paper
- Whenever possible, the chosen printer should be FSC certified and/or use FSC certified paper
- Print jobs should avoid the use of metallic or fluorescent inks.
- Request that your print job be produced with non-toxic, vegetable or soy based ink that is low VOC
- Ask if the vendor uses no-process printing plates; if they do not, seek an alternative vendor.
- Use printers that complete most aspects of the project in-house with exceptions to special features such as die-cut. If outsourcing is necessary for completion, take into account the distance the product will need to travel
- Ask where the paper originates from. If the paper is sourced from a far distance, ask for a different option
- Request a carbon neutral printing process when available. Otherwise identify whether vendor uses alternative energy to power their equipment
- Duplex (double-sided) laser printing is preferred option unless design is restrictive.
- Printers should be able to provide at least one of the third party certifications identified below:

5.3 Third Party Certification Labels
6. Green Construction Policy

6.1 Executive Summary

The environmental impact associated with construction activities can be mitigated by utilizing sustainable materials, improving indoor air quality, minimizing site disturbance, and reducing waste. BLP acknowledges the value of sustainable construction practices and has adopted the specifications below.

Global Facilities and Design is committed to developing and maintaining sustainable operations and facilities corporate wide. With that in mind, BLP acknowledges the value of sustainable construction practices when at all possible and has adopted the specifications below.

6.2 Scope

BLP’s Green Construction Policy (the Policy) applies to changes that affect the usable space in the building. Mechanical, electrical or plumbing system upgrades that involve no disruption of usable space do not require compliance with the Policy. BLP’s Green Construction Policy relates to any construction or renovation project occurring which meets one of the following qualifications:

For Alterations:
- In which substantial changes made to at least one entire room in the building, and require isolation of the work site from regular building occupants for the duration of construction.
- Exceeds a contract value of $10,000
- If painting or any type of liquid finish is included in the scope (not touch up painting)
- In which the use multiple contractors is required.
- That require a building permit

The BLP Green Construction policy establishes guidelines for developing a construction indoor air quality plan, a construction waste management plan, an erosion and sedimentation control plan and sustainable purchasing practices for construction materials.

6.3 Policy

6.3.1 Construction Indoor Air Quality (IAQ)

At least fourteen (14) days prior to any construction activity, the contractor shall develop and submit to BLP for review a construction indoor air quality (IAQ) plan. This plan shall address the following:

- Develop and implement an indoor air quality (IAQ) management plan for the construction and occupancy phases. During construction, meet or exceed the recommended design approaches of the Sheet Metal and Air Conditioning National Contractors Association (SMACNA) “IAQ Guidelines for Occupied Buildings Under Construction”, 1995 (or subsequent updates).
- List of IAQ protective measures to be instituted on the site
- Schedule for inspection and maintenance of IAQ measures
- When system must remain operational during construction, use temporary filters. Filters should be a Minimum Efficiency Reporting Value (MERV) of 8 or equivalent efficiency and be used at each return air grill as determined by ASHRAE 52.2-1999.
• When the system is off, all supply ducts, equipment and openings should be sealed with plastic for further protection.
• Replace all filtration media immediately prior to occupancy.
• During a capital project, which is typically classified as a new office, refurbishment, relocation or expansion, develop and implement an IAQ Management plan for the preoccupancy phases as follows:
  Upon completion of construction and installation of interior finishes, contractor shall install new filtration media and flush-out the affected space by supplying a total air volume of 14,000 cu.ft. of outdoor air per sq.ft. of floor area while maintaining an internal temperature of at least 60°F and, where mechanical cooling is operated, relative humidity no higher than 60%.

  The affected space may only be occupied following delivery of a minimum of 3,500 cu.ft. of outdoor air sq. ft. of floor area to the space, and provided the space is ventilated at minimum rate of 0.30 cfm/sq.ft. of outside air or the design minimum outside air rate, whichever is greater, a minimum of three hours prior to occupancy and during occupancy, until the total of 14,000 cu.ft./sq.ft. of outside air has been delivered to the space.

• Upon the completion of construction, HVAC and lighting systems must be returned to the designed or modified sequence of operations.
• Protect stored on-site or installed absorptive materials from moisture damage.

6.3.2 Best Practices

In addition to these minimum standards, implement the following best practices for construction IAQ as stated in the SMACNA standards as applicable to facility and construction scope.

6.4 HVAC Protection

• If possible, avoid using permanently installed air handlers for temporary heating/cooling during construction – particularly during demolition.
• If an open/un-ducted plenum over the construction zone must be used, isolate it by having all ceiling tiles in place.
• Check and seal all leaks in the return ducts and air handlers.
• The system should be isolated from the surrounding environment as much as possible.
• Do not store construction or waste materials in the mechanical room.
• If considerable accumulation of particles can be observed under diffusers or if ventilation is restricted, consideration should be given to cleaning the ducts and associated equipment. This decision should be based on a detailed visual inspection of the system.

6.5 Source Control

• When feasible use low emitting products (i.e. low emitting Volatile Organic Compounds – VOC’s). SEE BELOW 6.13

6.6 Construction Materials

• Use construction materials that reduce the environmental and air quality impacts.
6.7 Cleaning Solutions

Sustainable cleaning products, disposable janitorial paper products and trash bags with minimal environmental impact will be used on all construction projects. Exceptions to this policy may include special circumstances where the specified products are unable to satisfy the critical need.

All outside contractors are asked to use Green-Seal GS-37, 40 or 08 products [http://www.greenseal.org/findaproduct/index.cfm](http://www.greenseal.org/findaproduct/index.cfm) or products that comply with the California Code of Regulations [http://www.arb.ca.gov/enf/title17_94509.pdf](http://www.arb.ca.gov/enf/title17_94509.pdf) maximum allowable VOC levels. All disposable janitorial paper and trash bags shall comply with the U.S. EPA’s Comprehensive Procurement Guidelines. Additionally contractors should:

- Use electrically powered equipment (such as forklifts and chain saws) when feasible and use bottled gas instead of diesel for equipment such as generators or forklifts.
- Exhaust pollution sources to the outside through an available exhaust system or portable fan vented to the outside. Depending on the nature of the material and the location of the exhaust, special filtration may or may not be necessary. If exhaust is not feasible, a portable air cleaner may be effective.
- Keep lids on containers of construction debris, wet products or waste materials.
- A surface which emits a persistent odor source may be controlled by applying a sealer.
- Recover, isolate and ventilate containers housing toxic materials.
- Locate the storage of pollutant sources outside the range of occupied areas.

6.8 Pathway Interruption

- Depressurize the work area by adjusting the balance of the HVAC and exhaust systems or installing portable exhaust fans. As a general rule of thumb, exhaust the space at a rate of 10% greater than the rate of supply. Depending on the nature of the materials, location of the exhaust and any applicable regulations the exhausted air may or may not need to be filtered.
- If areas of the building are occupied during construction, increase supply air and or reduce return/exhaust air in area.
- Erect barriers to contain construction area. This can range from dust curtains to a plastic seal around the site. The barrier should be based on the materials involved and the implications of the dust or odor escaping from the site.
- Locate pollution sources to favorable locations in regards to air quality.
- Depending on the weather conditions, ventilate using 100% outside air to exhaust contaminated air directly to the outside during installation of VOC-emitting materials.

6.9 Housekeeping

- Control dust with wetting agents or sweeping compounds and use efficient dust collection methods.
- Increase the cleaning frequency in order to reduce dust.
- Porous building materials should be protected from exposure to moisture and stored in a clean area prior to installation.
- Keep all surfaces clean (including higher ledges and inside mechanical equipment)
- Remove spills or excessive applications of solvent-containing products as soon as possible.
- Keep site as dry as possible and remove accumulated water.
- Use a HEPA filter in vacuums to prevent the aerolization of settled dust.
6.10 Scheduling

- Sequence the installation of materials to avoid contamination of absorptive materials such as insulation, carpeting, ceiling tile and gypsum wallboard. Protect stored on-site or installed absorptive materials from moisture damage.
- When working in an occupied building, schedule to ensure that construction activity and building occupancy do not coincide.
- Upon completion of construction, replace all filtration media immediately prior to occupancy.
- When using materials with a high pollution potential, consider scheduling their installation during off-hours to allow time for the materials to air out.

6.11 Construction Waste Management

Fourteen days prior to any construction activity, the contractor shall develop and submit to BLP for review a Waste Management Plan to ensure that existing site and building materials are reused, salvaged, or recycled and to ensure that waste disposal in landfills shall be minimized.

If any waste materials encountered during the deconstruction/demolition or construction phase are found to contain lead, asbestos, PCBs, fluorescent lamps, or any hazardous substances, they are to be handled and removed in accordance with local, state, and federal laws and requirements concerning hazardous waste. These materials and any other hazardous materials must be excluded from the construction waste stream calculations.

As applicable, a target of 70% will be recycled and/or salvaged.

The plan shall include (but not be limited to) the following:

A. List of the recycling facilities, reuse facilities, municipal solid waste landfills, and other disposal area(s) to be used. Include name, location, and phone number.
B. List of proposed materials to be reused or recycled identified on a site pre-assessment.
C. List of materials that cannot be recycled or reused with explanation or justification.
D. Scheduled meetings to be held to address waste management. Meetings shall include subcontractors affected by the Waste Management Plan.
E. Storage and collection methods of waste and recyclables, handling procedures, and means of keeping recyclables free of contamination.
F. Description of the means of transportation of the commingled construction and demolition recyclable materials and an estimate of how often bins will need to be emptied.
G. Revise and resubmit plan as required by BLP. Approval of the Contractor’s Plan shall not relieve the Contractor of responsibility for compliance with applicable environmental regulations.

6.11.1 Construction Waste Management Report

The Contractor will record and track the type and quantity, by weight, of each material salvaged, reused, recycled or disposed on a monthly basis. The contractor personnel responsible for construction waste will report the waste diversion to the appropriate BLP personnel using the provided Construction Waste Report Spreadsheet. The contractor will also report the location where the items are disposed/recycled.

6.12 Erosion and Sedimentation Control Best Practice

All new construction, modifications to the exterior of existing buildings, landscape, and project site work must meet local erosion and sedimentation control codes. The interface between new construction and existing site development may not compromise existing erosion and sediment controls. Changes to landform and runoff patterns must be incorporated into the overall site drainage plan and submitted for review and approval.
In the event of any site construction, the Contractor shall develop and submit to BLP for review a Storm Water Pollution Prevention Plan that addresses the following erosion and sedimentation control tactics:

- Minimize the amount of disturbed soil
- Prevent runoff from offsite areas from flowing across disturbed areas.
- Slow down the runoff flowing across the site.
- Remove the sedimentation from onsite runoff before it leaves the site.
- Meet local or State requirements for sediment and erosion control plans.


In addition, all site construction resulting in disturbance of soil or removal of plant material must include a dust control program to minimize loss of soil through wind erosion as well as minimization of particulate (dust) air pollution.

### 6.13 Sustainable Purchasing of Construction Materials

BLP acknowledges the value of purchasing sustainable products and requires that vendors provide sustainable products when appropriate and/or possible. Vendors shall provide information on recycled content, rapidly renewable, FSC Certified, low VOC adhesives, sealants, and paints, FloorScore certified flooring, and products with no added urea formaldehyde that meet the below specifications in addition to providing reduced packaging options.

The contractor personnel responsible for construction material purchasing will report the sustainable material purchases to the appropriate BLP personnel using the provided Construction Materials Purchasing Spreadsheet.

A minimum of 50% of total facility alteration and addition material purchases (calculated based on cost excluding labor cost) will meet the following standards:

#### 6.13.1 Building Materials

- Contains at least 70% salvaged material from off-site or outside the organization
- Contains at least 70% salvaged material from on site through an internal organization materials and equipment reuse program
- Contains at least 10% post-consumer or 20% post-industrial material
- Contains at least 50% rapidly renewable materials
- Contains at least 50% Forest Stewardship Council (FSC) certified wood
- Contains at least 50% harvested and processed or extracted and processed within 500 miles of the project

#### 6.13.2 Adhesives and Sealants

Use adhesives and sealants that have VOC content less than the current VOC content limits of South Coast Air Quality Management District Rule #1168 [http://www.aqmd.gov/rules/reg/reg11/r1168.pdf](http://www.aqmd.gov/rules/reg/reg11/r1168.pdf)

#### 6.13.3 Paints and Coatings

Use paints and coatings that do not exceed the limits of Green Seal Standard GS-11 [http://www.greenseal.org/certification/standards/paints.cfm](http://www.greenseal.org/certification/standards/paints.cfm) Exceptions to this may include mechanical rooms which are not regularly occupied and require certain paints to meet the needs of the area.

#### 6.13.4 Carpet and Carpet Cushion
Purchase and use carpet and carpet cushion that complies with the requirements of the CRI Green Label Plus (carpet) and the CRI Green Label Program (cushion) Testing Program. The CRI Green Label Plus Testing Program certifies carpet and carpet cushion products that emit low amounts of VOCs (volatile organic compounds), which is crucial to improving indoor air quality. For information regarding CRI Green Label Plus Testing perimeters and details, visit www.carpet-rug.com.

6.13.5 Non Carpeted finished Flooring


6.13.6 Composite Panels and Agrifiber

Composite wood and agrifiber products are defined as: particleboard, medium density fiberboard (MDF), plywood, oriented strand board (OSB), wheatboard, strawboard, panel substrates and door cores. Materials that are not considered base building elements are not included in this category. BLP commits to using products without added urea-formaldehyde resins.
7. Waste Management Policy

7.1 Executive Summary

Bloomberg L.P. (BLP) acknowledges that waste prevention reduces pollution at the source, conserves natural resources, minimizes waste generation, decreases purchasing costs and waste disposal fees, and reduces the amount of material that must be managed for recycling and thus reducing overall operations and maintenance costs. Reusing products minimizes waste and costs associated with purchasing new products. Recycling keeps materials out of the waste stream and reduces natural resource consumption.

BLP commits to managing solid waste by reducing, reusing, and recycling whenever possible for products such as ongoing consumables, durable goods, materials used during facility alterations and additions, and hazardous waste.

7.2 Scope

The BLP Solid Waste Management Policy (the Policy) promotes waste prevention strategies such as material reuse centers, paper reduction campaigns, electronic file transfer, storage, and education. The Policy further provides direction on electronic waste recycling, recycling of standard and harder to recycle products including hazardous and organic waste streams.

7.2.1 Waste Reduction, Reuse and Recycling of Ongoing Consumables

Ongoing consumables include, but are not limited to paper, toner cartridges, glass, plastics, batteries, cardboard, and old corrugated cardboard, food waste and metals.

Waste Prevention

Packaging:
- Vendors should be requested to provide products with the least amount of packaging required.

Pallet:
- BLP recovers any wood pallets and plastic shipping containers for reuse or recycling.

Office Supplies:
- BLP facilities should set up designated office supply reuse centers for items such as: binders, file folders, staplers, paper clips, pens, notepads, desk accessories, etc.

Paper Reduction:
- Measure paper purchase and use at the beginning of each quarter and set a reduction goal for the following quarter(s).
- Use as appropriate electronic file systems for personnel forms, timesheets, manuals, etc.
- Employ standard practice to ensure that documents are printed double-sided.
- Require RFP bid submissions to be double-sided and submitted without extraneous materials.
- Reduce junk mail through the following practices:
  - Provide information on how to reduce the amount of junk mail received within the corporation and at employee’s homes.
    - Employees are encouraged to review the information provided by Direct Marketing Association (www.dmachoice.org) and to register for the “do not mail list”.

Electronic Files:
- BLP should attempt to store files and distribute documents electronically through the following practices:
  - Utilize e-mail distribution lists whenever possible instead of distributing printed material and/or documents.
  - Transmit and archive documents electronically as appropriate, including timesheets, invoices and correspondence.
  - Provide general notifications, flyers and newsletters to staff electronically rather than hard copies.

Education:
- Monitor waste prevention and report on activities. Periodically announce results on volume reduction (i.e. quarterly diversion rate – the amount of waste generated vs. what finally goes to the landfill).
- Provide on-going tenant and staff education on waste prevention, reuse, and recycling.
- Encourage waste prevention practices through signage, prompts, newsletters, and training and educational opportunities. Utilize electronic format whenever possible.

Recycling:
BLP facilities will maintain well-marked, specific areas for recycling the following:
- Paper (all types)
- Cardboard
- Corrugated Cardboard Boxes
- Plastic
- Glass
- Metal
- Batteries
- Fluorescent light bulbs
- Toner/Ink cartridges
- Composted

7.2.2 Recycling of Batteries and Mercury Containing Lamps (Hazardous Waste)
- All batteries and lamps will be properly stored on site and then shipped to or picked up by a qualified waste/recycling vendor. The vendor will recycle the lamps and batteries to the fullest extent and divert any hazardous waste from the landfill and provide appropriate supporting documentation including a report on the volume of recycled materials.

7.2.3 Organic Waste
- Where feasible, all food waste will be diverted from the landfill and composted.
- All landscaping waste will be mulched and/or composted for reuse where feasible. Use of mulching mowers for grass cutting must be specified. Such mowers employ special ‘mulching’ blades that cut the grass finely and allows clippings to fall back into the turf and decompose, eliminating grass from the waste stream entering the landfill.

7.2.4 Waste Reduction, Reuse and Recycling of Durable Goods
Durable goods include, but are not limited to, office equipment (i.e. computers, monitors, copiers, printers, scanners, fax machines), appliances (i.e. refrigerators, dishwashers, water coolers), external power adapters, televisions, and other audio-visual equipment. Furniture should be used for as long as possible and then discarded or donated in a manner consistent with Bloomberg policies.

7.2.4.1 Electronic Waste
BLP will minimize electronic waste through the following practices:

- Replace monitors, computers and other electronic equipment only as needed and upgrade when possible to models with a longer life.
- Replace individual desktop printers with group multifunction devices (MFDs) to reduce the energy consumed through individual printers and to reduce electronic waste produced.

All computers and electronic waste will be picked up by an organization/recycler which salvages or recycles the materials, and diverts 100% of the waste. The organization/recycler will provide appropriate supporting documentation.

Wherever possible, Bloomberg should partner with recyclers and scrappers that abide by the e-Stewards Certifications scheme. The e-Stewards certification program for electronics recyclers is designed to provide market incentives that drive the certification of the entire recycling chain that is managing the toxic materials. In addition, early efforts are underway to develop a program to qualify or certify companies who collect and transport electronics, in order to increase the total volumes of electronics managed in a globally responsible manner. Together, these programs will create a network of responsible collection and processing entities, ensuring businesses and consumers alike that their old technology will not poison vulnerable populations, recycling workers or the global ecosystem.

In addition to complying with any applicable statewide electronic recycling efforts, consult the information provided by the Step Initiative Solving the E-waste Problem (www.step-initiative.org) for guidance in disposing of electronic waste and/or for manufacturer and provided take back options.

7.2.5 Construction and Demolition Waste

(See Green Construction Policy Document)
For any construction projects inside the project building or on the site (including retrofits, renovations or modifications), follow guidelines as directed in the Green Construction Policy

7.2.6 Waste Stream Management and Record Keeping

It is the intent of BLP to reduce waste and increase the diversion of waste from the landfill. To be able to benchmark the success of this program, BLP facility managers shall maintain records of recycled materials and commercial waste volumes sent to the landfill. For this purpose utilize the “Waste Management Matrix” for record keeping. Every two years in locations with 50 people or more facility managers should have a waste stream audit performed to validate the amount of waste reduction and landfill diversion. The waste stream audit should be performed by a third party qualified to do so.
8. Green Cleaning Policy

8.1 Executive Summary

Many janitorial cleaning products have been shown to degrade indoor air quality, pollute the water, and negatively impact the health of sensitive occupants. In effort to maintain a clean facility, janitors and facility managers often use harsh solutions that, while disinfecting the building, contaminate the indoor air.

It is BLP’s desire to maintain both a clean facility and a healthy environment for all occupants of their buildings and therefore is committed to the policies below. It is the responsibility of the BLP site manager to ensure contractor compliance with the Green Cleaning Policy.

8.2 Scope

The BLP Green Cleaning Policy (the Policy) outlines general approaches to green cleaning, custodial cleaning contract specifications, and guidelines for green cleaning solutions. The Policy further specifies methods for reducing dust and dirt and microbial growth through preventative measures and proper cleaning. Additional guidelines on treatment of carpets, janitorial training requirements, chemical storage guidelines, cleaning equipment standards and specifications, and custodial effectiveness assessment are provided.

8.3 Policy

8.3.1 Approaches to Green Cleaning

A. BLP cleans in order to:
   1. Maintain a healthy indoor environment for all occupants
   2. Maintain a clean facility and consequently increase the lifetime of the facility, fixtures and systems as well as maintaining the value of same.

B. Coordinate cleaning basic environmental management strategies:
   1. Control pollution and waste by reducing the amount of consumables
   2. Limit indoor-polluting activities
   3. Ventilate buildings to reduce indoor contaminants
   4. Design facilities and ventilation systems to optimize indoor air quality

C. Follow standard environmental protection guidelines:
   4. Prioritize worker and occupant safety
   5. Establish that the primary reason to clean is the preservation of health, secondary reason is building appearance
   6. Clean to maximize the extraction of pollutants (particles, gas, and biopollutants) from the building environment
   7. Minimize chemical, particle, and moisture residues
   8. Minimize human exposure to pollutants with safe handling and storage practices
   9. Clean to improve the total environment
   10. Proper disposal of janitorial waste

NOTE- Any BLP property that does not adopt the above Approaches, must document reason for the exclusion.
8.3.2 Custodial Cleaning Contract Specifications

A. Janitorial contracts will include the BLP Green Cleaning Policy, which addresses, at a minimum: green product specification, staff training, solution storage, dilution and safe handling and equipment specifications.
B. Preference will be given to custodial vendors certified under GS-42 Commercial and Institutional Cleaning Services where available.
C. The cleaning products used must meet Green Seal’s GS-37 standard (Appendix A- GS-37 Standard) or GS-40 (or accepted ecolabel). For chemicals that the GS-37 rating is not applicable to, (i.e. carpet cleaners, floor finishes, or strippers), use products that comply with the California Code of Regulations maximum allowable volatile organic compound (VOC) levels.
D. In order to reduce packaging waste, concentrated cleaning products will be utilized when available and feasible.
E. BLP’s Green Cleaning specifications include, but are not limited to:
   1. Purchasing and using janitorial products that meet the GS-37 standard or comply with the California Code of Regulations maximum allowable VOC levels (or accepted ecolabel).
   2. Training janitorial staff in green cleaning practices and documenting hours (to include a minimum of 8 hours annually with refresher training if required).
   3. Purchasing and using paper products and trash liners that comply with the U.S. Environmental Protection Agency Comprehensive Procurement Guidelines, Commercial Sanitary Tissue, Approved Trash Can Liners (or accepted ecolabel).
   4. Requiring that janitorial companies use green cleaning equipment such as microfiber mops and high-efficiency particulate air (HEPA) filters in vacuum cleaners for cleaning practices.

NOTE- Any BLP property that does not include all of the above practices in their janitorial contract, must document the reason for the exclusion.

8.3.3 General Green Cleaning Solutions Guideline

The cleaning products used must meet the Green Seal’s GS-37 standard (Appendix A- GS-37 Standard) (or an accepted ecolabel). Green Seal also maintains a complete listing of Green Seal Cleaning Products.

Procurement of general cleaning supplies such as dishwashing liquid and desk cleaner must meet the GS-37 Industrial Cleaner Standard or California Code of Regulation (or accepted ecolabel) standards.

- Employees should be made aware of the availability of such supplies. Employees are discouraged from bringing general cleaning supplies from home and should not bring cleaners that do not meet the GS-37 (or accepted ecolabel) standard. All employees should be made aware of these guidelines.

- To the extent practical, no cleaning or disinfecting products will contain ingredients that are carcinogens, mutagens, or teratogens. These include chemicals listed by the U.S. EPA or the National Institute for Occupational Safety and Health listed on the OSHA Toxic Release Inventory (40 CFR, Section 372, Subpart D). If such products containing these toxic chemicals must be used (cleaning solutions for specific equipment, etc), only the minimum amounts will be used and the product must be disposed of properly.

NOTE- In the case that a BLP property is unable to adopt the above practices, the BLP property manager must document the reason for the non-compliance.

8.3.4 Reducing Dust & Dirt with Proper Cleaning and Preventive Measures

Minimizing the amount of dust and dirt present in the building will reduce the amount of time and resources spent on maintaining a clean environment; the less dust and dirt, the fewer solutions and time needed to clean.
A. Place entryway mats at all main points of entry as appropriate into the building(s)
   1. The entryway mats should measure at least five steps in length (approximately 10 feet) but do not need to span the entire width of the point of entry
   2. Maintain a cleaning schedule for all main points of entry into the building that specifies how often and by what means the mats are cleaned (example: vacuum once a day)
   3. Vacuum often

B. Clean the floor with a vacuum, microfiber dust mop or damp-mop instead of a broom

C. Vacuum effectively
   1. Use a vacuum cleaner with a high-efficiency particulate air (HEPA) filter. Only uses a HEPA filter on vacuums that are specifically designed for such a filter. (Machines that aren’t designed with the intent of using a HEPA filter leave too many gaps in the system for the HEPA filter to be effective.)
   2. Use high-efficiency microfiltration bags, which retain dust and particles in the .3 micron range or smaller. (These bags may cost more but save on labor by reducing dust circulation.)
   3. Change bags before they are completely full

D. Dust effectively
   1. Use a damp, folded cloth or cloth-covered feather duster or a microfiber dust cloth.
   2. Use a wiping motion, rather than a flicking or sweeping motion, to ensure that dust remains on the cloth.
   3. Change cloths frequently.
   4. When using treated dust mops, obtain pre-treated mop heads from a laundry service or spray the mop heads outdoors. (Dust-mop sprays generally contain petroleum products that can harm the user and building occupants.)

E. Floor buffers
   1. Use a medium-speed buffing machine; medium-speed machines generate fewer particles of chemicals and dirt than a high-speed buffer.
   2. Use a vacuum attachment to the buffing machine whenever available.

NOTE- Any BLP property that is unable to employ the above proper cleaning and preventative measures for dust and dirt reduction must document their alternative practices.

8.3.5 Reducing Microbial Growth through Proper Cleaning

The following are basic guidelines to minimize the need for antimicrobial products

A. Clean first and then apply disinfectant
   1. Most disinfectants are not cleaners, and are usually only effective on a clean surface.
   2. Wait the recommended time before rinsing the antimicrobial solution from the surface (usually at least 10 minutes)

B. Use disinfectants only when and where required.
   1. Ordinary detergents should remove more microbes than disinfectants

C. Disinfect mop heads and sponges daily to reduce microbial growth

D. Change cleaning water frequently (water used in mop-buckets, etc.)
   1. Do not waste water by overfilling mop buckets, etc.

E. Clean areas where water collects and condenses
   1. Areas such as refrigerator and air conditioner pans as well as air cleaner/humidifier machines

F. Use a drain maintainer in hard to access areas (containing enzymes) if drains clog or have odors

G. Hand soaps must meet the following standards:
1. No antimicrobial agents (other than as a preservative) except where required by health codes or other regulation (i.e. food service areas and health care operations).

2. Green Seal GS-41 for industrial / institutional hand cleaners

3. Environmental Choice CCD – 104A hand cleaner and soaps

Catering or food preparation services performed on BLP sites must use antimicrobial soaps and/or disinfectants

NOTE- Any BLP property that uses antimicrobial products needs to document the specific antimicrobial used, the location, date and reason for use.

8.3.6 Special Treatment of Carpets

Carpet can be a source of biopollutants, dust, and volatile organic compounds (VOCs). Pesticides and cleaning products (such as stain removers) that remain on the carpet after initial application can volatilize (rise up into the air) over time and contaminate the indoor air.

The following carpet treatment guidelines will mitigate the need for carpet cleaning solutions through both preventative and prescriptive treatment.

A. Prevent stains
   1. Clean up spills promptly using cold water and one, or more blotting cloths
   2. Have spill kits readily available. BLP occupants should enter a FDSK Ticket immediately. Spill kit to be addressed by cleaning contractor and conform with the green materials requirement.

B. Promptly clean and thoroughly dry carpets if they should become saturated with water
   1. Quick action following a leaks or other water damage may prevent carpet loss and the growth of mold and/or mildew. (Do not attempt to clean a moldy carpet without proper protective equipment, clothing, respirators, and air filters. Special training may be required to adequately deal with a water-soaked carpet.)

C. Avoid excessive use of carpet shampoos and bonnet cleaning products. Bonnet cleaning involves the use of cotton, rayon, and/or polypropylene pads and a rotary shampoo machine. Although these chemicals are usually mild, overuse makes more frequent extraction cleaning necessary.

D. Deep-clean when necessary.
   1. Periodically deep-cleansing of carpet is necessary to extract dirt, biopollutants, moisture, and embedded cleaning agents.
   2. A wet vacuum water extraction machine after dry vacuuming may be used.
   3. Reduce the amount of chemicals utilized. Sprays should be applied carefully (no overspray) and left on long enough to ensure proper cleansing.
   4. The Carpet and Rug Institute recommends rapid drying of the carpet, within 24 hours.

NOTE- Any BLP property that uses alternative carpet care practices must document their current practices.

8.3.7 Janitorial Training Requirements

A. Basic Janitorial Training
1. Janitorial workers should receive basic training, including the Green Cleaning specifications delineated in BLP’s Green Cleaning Policy
2. A minimum of 8 hours of documented training per year per employee is required

B. Training Specifications should include:
   1. Review of the Material Safety Data Sheets (MSDS)
   2. Compliance with the Green Seal standard of GS – 37 or equivalent
   3. How to use Personal Protective Equipment (PPE)
   4. Janitors should be informed of BLP’s product reporting requirements.
      a. All cleaning products which are not on the GS-37 list must be approved by the BLP site manager or authorized employee.

C. Provide BLP site manager or authorized employee with training logs indicating the attendees and the training topic

8.3.8 Chemical Storage Guidelines

A. Any chemical stored in the janitor’s closets must have a locked container which encloses the liquid cleaning products and delivers out proper specified measurement for dilution.

B. The solutions used are all to be stored in the janitor’s closet(s) and the janitorial staff must follow these guidelines:
   1. Material Safety Data Sheets (MSDS) must be available to all employees. (Custodians are trained on MSDS and Chemical Handling annually.)
   2. All containers must be properly labeled to be easily identifiable
   3. All cleaning products must be properly and safely stored.
   4. No liquids will be placed on shelves above eye level
   5. Custodians must use appropriate Personal Protective Equipment
   6. Chemical dilution systems must be adhered to
   7. Only the necessary amount of chemicals should be stored in the janitor’s closet. Bulk chemical storage should be maintained at an appropriate offsite location.
   8. Only authorized employees will have access to the main storage room.

8.3.9 Cleaning Equipment Standards and Specifications

A. Vacuum cleaners meet the requirements of the Carpet & Rug Institute Green Label Program (or accepted ecolabel) and are capable of capturing 96% of particulates 0.3 microns in size and operate with a sound level less than 70dBA.
B. Hot water extraction equipment for deep cleaning carpets is capable of removing sufficient moisture such that carpets can dry in less than 24 hours.
C. Powered maintenance equipment including: floor buffers, burnishers and automatic scrubbers are equipped with vacuums, guards and/or other devices for capturing fine particulates, and operate with a sound level less than 70dBA.
D. Propane-powered floor equipment is not to be used unless deemed appropriate by site conditions.
E. Automated scrubbing machines are to be equipped with variable-speed feed pumps to optimize the use of cleaning fluids.
F. Battery-powered equipment is to be equipped with environmentally preferable gel batteries.

G. Where appropriate, active micro fiber technology is to be used to reduce cleaning chemical consumption and prolong life of disposable scrubbing pads.

H. Powered equipment is to be ergonomically designed to minimize vibration, noise and user fatigue.

I. Equipment is to have rubber bumpers to reduce potential damage to building surfaces.

J. A log is to be kept for all powered housekeeping equipment to document the date of equipment purchase, repair and maintenance activities and the respective vendor cut sheets for each type of equipment mentioned in the logbook.

8.3.10 Custodial Effectiveness Assessment

This standard for custodial services establishes the amount of space a custodian is to be able to clean given the characteristics of the space. It is based on the APPA custodial effectiveness audit process.

An annual audit is to be performed by an individual one management level above the party responsible for custodial services. This audit is based on the standard provided in the custodial assessment form. BLP requires a minimum level of cleanliness as describe in level 2 in the Custodial Effectives Report form.

Level 1 - Orderly Spotlessness

- Floors and base moldings shine and/or are bright and clean
- All vertical and horizontal surfaces have a freshly cleaned or polished appearance
- Washroom and shower tile and fixtures gleam and are odor free
- Trash containers are empty, clean and odor free
- Lamps all work and all fixtures are clean
- Washroom and shower tile and fixtures gleam and are odor free

Level 2 - Ordinary Tidiness (this is the level that should be maintained)

- Floors and base moldings shine and/or are bright and clean
- All vertical and horizontal surfaces are clean, but marks, dust, stains or streaks are noticeable with close observation
- Washroom and shower tile and fixtures gleam and are odor free
- Trash containers are empty, clean and odor free

Level 3 - Casual Inattention

- Floors are swept clean, but upon close observation dust, dirt and stains, as well as a buildup of dirt, dust and/or floor finish in the corners and along walls, can be seen
- All vertical and horizontal surfaces have obvious dust, dirt, marks, smudges, and fingerprints

Level 4 - Moderate Dinginess

- Floors are swept clean, but are dull. Colors are dingy, and there is an obvious buildup of dust, dirt, and/or floor finish in the corners and along walls. Molding is dull and contains streaks and splashes
- All vertical and horizontal surfaces have conspicuous dust, dirt, smudges, fingerprints, and marks that will be difficult to remove
- Less than 5% of lamps are burned out and fixtures are dingy
- Trash containers have old trash. They are stained and marked. Trash cans smell sour.
Level 5 - Unkempt Neglect

- Floors and carpets are dirty and have visible wear and/or pitting. Colors have faded and dingy, and there is a conspicuous buildup of dirt, dust, and/or floor finish. Base molding is dirty, stained, and streaked. Gum, stains, dirt, dust balls and trash are broadcast.
- All vertical and horizontal surfaces have major accumulations of dust, dirt, smudges, and fingerprints, as well as damage.
- More than 5% of lamps are burned out and fixtures are dirty and with dust balls and flies.
- Trash containers overflow. They are stained and marked. Trash containers smell sour.
9. Integrated Pest Management Policy

9.1 Executive Summary

While pests pose significant problems to people, property, and the indoor environment, the pesticides used to solve these problems bring risks as well. In an effort to maintain a healthy indoor environment for all building occupants, BLP adopts the Integrated Pest Management (IPM) programs and procedures as pest control measures.

IPM is a process for achieving long-term, environmentally sound pest suppression and prevention through the use of a wide variety of technological and management practices. The IPM approach is intended to reduce the need for chemical application.

9.2 Scope

For the purpose of this IPM Policy, pests are living organisms (animals, plants, or microorganisms) that interfere with the intended building function and/or the behavior of its occupants. The pest species and the degree to which that population poses a threat to the occupants and/or structure will determine the strategy(s) for best managing that particular pest population.

The Policy establishes service requirements and scheduling for suppliers/vendors who handle pest control. The Policy further provides IPM procedures with control strategies that are intended to reduce the need for chemical application, and guidelines for rodent and insect control, and for the application of pesticides.

BLP will continually evaluate the progress of this IPM in terms of effectiveness and safety, and will implement such changes as are necessary. The vendor will adjust practices to adhere to IPM policies.

9.3 Policy

9.3.1 Service Requirements

Supplier/Vendors and parties who apply pesticides must comply with all of the IPM specifications in this policy as well as any local, state or federal laws, codes or regulations. Pesticide applicators must be educated and trained in the principles and practices of IPM and the use of pesticides and must follow all of the specifications in this policy. The supplier/vendor will furnish all supervision, labor, materials, and equipment necessary to accomplish the monitoring, trapping, pesticide application, and pest removal components of the IPM program. The supplier/vendor shall also provide detailed, site-specific recommendations for structural and procedural modifications to aid in pest prevention. Records will be kept on the number of pests or other indicators of pest populations both before and after any treatments.

9.3.2 Contractor Service Schedule and Conduct

Routine pest control visits must not disrupt occupant productivity nor pose a threat to occupant health or well being. If pest control visits must occur during the hours of building occupancy, the supplier/vendor will take care to ensure minimal disruption. The supplier/vendor will observe all safety precautions throughout the performance of the contract. Federal, state, and local safety and health requirements must be observed at all times. Where there is a conflict between applicable regulations, the most stringent will apply.
9.3.3 Integrated Pest Management Procedures

**IPM Control Techniques:**

The supplier/vendor will use the following four techniques as appropriate:

- **Environmental Controls:** The intentional manipulation of the environment in order to reduce pests accessibility to food, water and shelter. Such control is attributed to the building occupants’ conscientiousness regarding a tidy and sanitary working environment. Sanitation is crucial to pest prevention; if an environment is sanitary, the pest does not have the crucial means for survival, is vulnerable and will either die or leave. While environmental control is a powerful prevention technique, if an area is already infested, the following techniques may be needed to rid the area of the pests:
  1. Basic housekeeping
  2. Storing food in insect-proof containers
  3. Ensuring water drainage where mosquitoes might flourish
  4. Frequent waste collection at both interior and exterior building collection locations and/or waste hauler loading zones
  5. Proper maintenance or inspection of indoor plants

- **Mechanical Controls:** Without the use of chemicals, these controls are directed at destroying a pest and/or its habitat. This IPM policy specifies the proper use of the following techniques.
  1. Traps – rat, mouse, insect, etc.
  2. Removal of nests and/or webs
  3. Sealing off cracks or crevices where insects and/or rodents may enter

- **Organic Controls:** Controls that are derived from organic compounds such as tree bark or flowers and comes in the form of oils or dusts can be highly effective in pest control.

- **Chemical Controls:** In general, chemical controls refer to pesticides that are used to kill infesting pests. Chemical control is the last resort for pest control in BLP facilities. This IPM policy specifies the handling, use and application of chemical controls.

9.3.4 Guidelines for Rodent and Insect Control

**Rodents**

- **Trapping Devices:** As a general rule, rodent control will be accomplished with trapping devices only. All trapping devices will be in protected areas and concealed from plain view so as not to be affected by routine cleaning and other operations. Trapping devices shall be logged in a supplier/vendor log. The supplier/vendor is responsible for disposing of all trapped rodents and rodent carcasses in an appropriate manner.

- **Rodenticides:** When the supplier/vendor deems rodenticides as necessary means for adequate rodent control inside the building, the supplier/vendor will obtain BLP approval prior to applying any interior rodenticide treatment. All rodenticides, regardless of packaging, will be placed in an EPA-approved tamper-resistant bait box or a secure location that is inaccessible to children, pets, wildlife, and domestic animals.

- **Bait Boxes:** All bait boxes will be maintained in accordance with EPA regulations, with an emphasis on the safety of non-target organisms. The supplier/vendor will take care concerning the following:
  1. All bait boxes are placed out of the general view, in locations where they will not be disturbed by routine operations.
  2. The lids of all bait boxes are securely locked or fastened shut.
  3. All bait boxes are securely attached or anchored to floor, ground, wall, or other immovable surface.
4. Bait is secured in the feeding chamber of the box instead of the runway or entryways of the box.
5. All bait boxes are labeled on the inside with the supplier/vendor’s business name and address, and dated at the time of installation and each servicing.

**Insect Control**

- **Non-Pesticide Methods:** The supplier/vendor will employ non-chemical methods of control wherever possible. Such methods may include: The use of trapping devices and vacuums rather than pesticide sprays as a means to cleanout cockroach, ant or other insect infestations.

- **Monitoring:** Sticky traps will be used to monitor and evaluate indoor insect control.

- **Cracks and Crevices:** As a general rule, the Supplier/Vendor will apply all insecticides as “crack and crevice” treatments only, meaning the insecticide is not visible to a bystander during or after the application process because it is concentrated and applied to the cracks and crevices only.

- **Bait Methods:** Bait application is the standard pesticide technology approach for cockroach and ant control. Supplier/Vendor will use bait as a method of insect control in all cases unless some circumstance calls for alternative forms of control in which case approval is required.

- **Application of Insecticides to Exposed Surfaces:** Application of insecticides to exposed surfaces or as space sprays is, in general an unacceptable method of treatment. If the Supplier/Vendor deems it necessary to employ such a technique, BLP must approve the treatment. No surface application or space spray will be made while occupants are in the building. In the case of such an application, the Supplier/Vendor and BLP will take all necessary precautions to ensure occupant and employee safety, and the containment of the pesticide to the site of application.

### 9.3.5 Guidelines for Application of Pesticides

The Supplier/Vendor is responsible for applying all pesticides according to the product instructions. All pesticides used by the Supplier/Vendor must be registered with the U.S. Environmental Protection Agency (EPA), state and/or local jurisdiction and applied within compliance of any federal, state or local laws, codes and regulations. The Supplier/Vendor will adhere to the following rules for pesticide use:

- **A. Approved Products:** The Supplier/Vendor will only use products as documented and approved in the service agreement.

- **B. Pesticide Storage:** The Supplier/Vendor will not store any pesticide product in BLP facilities without BLP consent or instruction.

- **C. Application as Needed:** Pesticide application will be on an as needed basis instead of by schedule. As a general rule, application of pesticides in any area should not occur unless the Supplier/Vendor has already monitored and inspected that area and found a reasonable need for chemical treatment. Written approval must be granted prior to any pesticide application as a preventative measure.

- **D. Minimization of Risk:** When pesticide use is necessary, the Supplier/Vendor will apply the least hazardous material and use precise application techniques in order to use a minimal quantity of product.

- **E. Universal Notification:** The Supplier/Vendor will immediately notify BLP Facilities of the need for pesticide application. A date and time for this application will be determined by both parties. BLP will then notify building occupants or direct the Supplier/Vendor to do so within compliance of local law, code or regulations. In the absence of any governmental or specific occupant requirement, notification should be made at least 72 hours prior to pesticide application, under normal conditions. In the case of an emergency application, the same procedure as normal conditions will be followed except only 24 hours prior notice is required. All communications will be approved by BLP in advance of their distribution to building occupants.
Universal notification should include the pesticide product name, active ingredient, product label signal word (e.g. “caution” or “danger”), the time and location of the application, and contact information for persons seeking more information.

F. Pesticide Handling: Transport, handling, and use of all pesticides will be in strict accordance with the manufacturer’s label instructions and all applicable Federal, state, and local laws and regulations.

G. Recordkeeping: Vendors are required to maintain a log of all pesticide applications, including information on the targeted pest, the date and time of the application, the application location, the person responsible, the pesticide applied (including trade name, active ingredient, and EPA registration number), and the date, time, and method of universal notification. This helps Bloomberg verify implementation of the guidelines.

9.3.6 Cautionary Labeling for Pesticides

Various Federal, state and local laws require precautionary statements and signal words be included on all pesticide labels. This does not apply to non-toxic or "natural" materials. If none of these warnings are provided, do not use the pesticide.

- DANGER-A taste to a teaspoonful taken by mouth could kill an average-sized adult.
- WARNING-A teaspoonful to an ounce taken by mouth could kill an average-sized adult.
- CAUTION-An ounce to over a pint taken by mouth could kill an average-sized adult.
10. Sustainable Warehouse Guidelines

10.1 Executive Summary
Bloomberg’s warehouses are responsible for the storage, receiving and shipping of Bloomberg’s products throughout our entire distribution network. As a result, the warehouse operations generate significant waste – including packaging materials, obsolete equipment and trash associated with everyday operations.

Considerable efforts have been made to integrate reduction, reuse and recycling efforts into the standard operations and as a result 98% is currently recycled or resold (2008 Data). Below is a list of best practices which all warehouses globally can adopt to help minimize their environmental impact and further reduce Bloomberg’s carbon footprint.

10.2 Waste Disposal & Recycling

10.2.1 Solid Waste Disposal
- Compliance with Bloomberg’s Solid Waste Management Policy
- Separation of waste by type for maximum recycling within warehouse – Cardboard, Paper, Plastic, Foam, Peanuts
- Separation of waste by type for maximum recycling within office space – Paper, Plastic, Aluminum Cans, Batteries
  - Flexibility should be given within different countries as recycling standards and processes vary by country
- Where possible, warehouses should engage their local hauler to develop a composting program for biodegradable waste
- Warehouses should utilize supplies from easily re-usable resources, for example plastic skids instead of wooden skids

10.2.2 Electronic Waste Disposal
- Compliance with Bloomberg’s e-waste requirements located with the Sustainable Electronics Manufacturing Policy
- Every effort should be taken to divert any materials which could be considered electronic waste from landfills
- Every warehouse/region should have a reliable electronics recycler/scrapper to dispose of electronic waste in accordance with Bloomberg policies, procedures and standards

10.3 Waste Tracking
As part of their daily operations, warehouses are required to gather monthly data associated with their waste disposal & recycling efforts. Data for all recycled waste should include tonnage, and dollars received from suppliers (if relevant), for all materials noted in section 1.2.1 & 1.2.2. Please see exhibits 1 & 2 for tracking documentation. Bloomberg has set a goal of recycling/re-using or reselling 100% of all waste.

10.4 Packaging
Warehouses, in coordination with Bloomberg Engineering and Asset Management, should continually seek ways to reduce, reuse and recycle packaging; eliminate petroleum based materials; increase recycled packaging content; and push back on high volume vendors to do the same.
10.5 Lighting
Warehouses are typically vast buildings consisting of large square footage areas. In order to minimize the electrical demand on the facility, warehouses should install lighting sensors which detect movement within aisles or areas as lighting is needed. Areas which are unoccupied for a half hour should automatically turn their lights off until movement in that area is again realized. This investment will reduce electricity demand and costs while reducing the warehouses impact on our carbon footprint.

10.6 Cleaning
- All warehouses should be in compliance with the Green Cleaning Policy
- All warehouses should be in compliance with the Integrated Pest Management Policy
- All warehouses should be in compliance with the United States Department of Labor Occupational Safety & Health Act (OSHA) of 1970
  - Regions outside of the United States should be in compliance with all applicable laws and regulations within their local country
11. Sustainable Event Policy

11.1 Executive Summary

Sustainable event planning considers the environmental impacts of all types of events (such as internal receptions, hotel trainings, exhibitions, etc.) from their inception to execution. This includes the choice of venue, travel options, food preparation and consumption, printing of marketing material, vendor relations, and shipments of Bloomberg materials to and from the event. When planning internal or external events the planning process should include: choosing ecologically responsible venues and vendors, reducing the amount of salespeople travelling for any given event, and reducing the amount of materials printed and shipped. One of the best guidelines for us to follow in Corporate Events is “Reduce, Reuse, and Recycle.”

11.2 Guidelines

In an effort to teach and lead by example, Bloomberg LP events are produced with a dedication to environmental sustainability. To that end, we are asking participating sponsors, vendors, volunteers, and other stakeholders to join us in our commitment to the following environmental sustainability goals:

- Minimize unnecessary product usage and waste creation.
- Conserve resources, including water and electricity.
- Utilize products that are recycled/recyclable, repurposed/repurpose-able, and reused/reusable.
- Advance individual and organizational commitment to environmental sustainability.

To measure the realization of these ideals, we will utilize industry recognized green event planning standards. These standards are enumerated in the procedural guide below.

11.2.1 Air Quality

- No smoking policy indoors, within 20 feet of air intakes and doorways.
- No idling policy, requiring signage and communication regarding policy.
- Use “green fleet” for transportation whenever possible.
- Encourage & provide information for mass & alternate transit for employees & event attendees.
- Actively search for sites to host events that minimize travel related greenhouse gas emissions.
- Suppliers and exhibitors are to use SmartWay (or similar) Transport when appropriate. SmartWay Transport are transportation/shipping providers who have partnered with the EPA in order to reduce transportation-related emissions. Providers include FedEx, UPS. A complete list is available here: http://www.epa.gov/smartway/partnerlists/partner-list.htm

11.2.2 Community Partners

The following practices are in the case of excess or left over items that are available for donation and not reusable by Bloomberg LP. It remains a core policy that event planners should attempt to order to the best of their ability and not to over purchase.

- Post- event: donate leftover food supplies to local community or non-profit organizations to the extent allowable by local health codes.
• Provide information to suppliers, vendors, exhibitors, attendees, and all stakeholders regarding re-using, recycling, donating, and/or re-purposing supplies, product, materials and any other event associated items to non-profit or community organizations local to the event.

### 11.2.3 Communications

Successful incorporation of sustainability practices to Bloomberg LP meetings and events suggests that the discussion start at the beginning of the event planning process. Planners and vendors should engage in dialogue around sustainable event solutions in the same conversation as availability and pricing. Leaving the conversation and expectations to the event day prevents the incorporation of a system/process in place to ensure your sustainability goals.

- Track, record, and communicate all environmental efforts with all appropriate parties.
- Communicate, educate and encourage ways that employees, attendees, suppliers, and clients can participate in environmental goals and practices
- Educate staff on environmental policies regularly and ensure they can effectively communicate those policies.
- Request waste reduction, energy and water conservation plans/policies from all appropriate parties.
- Communicate event waste reduction reports to all appropriate parties.

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<th>Event Leadership Team</th>
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#### 11.2.4 Energy

- LED / SOLAR powered lighting to be used as much as possible.
- Electronic equipment is to be highest energy star rating possible.
• Power down procedures are to be adhered to at night / off event hours when appropriate.
• Power consumption to be minimized during load in/ load out and sound checks/ rehearsals.
• Highest available efficiency bulbs to be used in fixtures.

11.2.5 Procurement

11.2.5.1 Certifications and Sourcing
• Partner with venues that have documented environmental certifications such as LEED, Green Seal, Green Key, Dine Green, etc.
• Certified green cleaning products are to be used in conjunction with towels / reusable cleaning supplies.
• Locally source a minimum of 20% of event materials.
• Actively follow and purchase according to the documented environmental procurement policies, specify the environmental sustainability attributes of products to be purchased, or meet the environmental sustainability specification in the RFP, or combination thereof.

11.2.5.2 Paper
• Printing is to be done on post-consumer recycled paper, with vegetable/soy based inks as provided by Bloomberg LP Ink.
  o Bloomberg has developed a hierarchy for paper decisions. Paper should be sourced accordingly
    ▪ Post-Consumer Recycled Content
    ▪ Pre-Consumer Recycled Content - FSC Certified
    ▪ Pre-Consumer Recycled Content
    ▪ No Recycled Content - FSC Certified

11.2.5.3 Premium Items and Materials
• Giveaways and promotional items are to be minimized, sourced locally, and/or produced with recycled/compostable/reusable content whenever possible.
• Source items that can be re-intentioned with the donation recipient in mind.
• No non-biodegradable Styrofoam is to be used.

11.2.5.4 Food and Beverage
• Ensure a minimum of 25% of total food and beverage purchased for the event is certified organic, local, and/or sustainably produced.
• Ensure 100% of coffee purchased for the event is certified organic, Rainforest Alliance-certified, Fair Trade Certified, or maintains a similar sustainable farming certification.
• Ensure a minimum of 10% of beverages other than coffee for the meeting are organic, local and/or sustainable
• Ensure non-food items used in event food service or food preparation are environmentally preferable.
• Use carry-out/concession packaging that is compostable, biodegradable, bio-based, recyclable, or made with recycled content.
• Use recycled content and bio-derived renewable content ink for paper menus and printed material for the event.
• Use garnishes, centerpieces, and decoration that can be eaten, donated, recycled, reused, planted, or composted.
• Provide vegetarian or vegan entrée options.

11.2.6 Staff Management

• Communicate (EVENT) written environmental objectives and performance criteria to staff.
• Have sustainability policy signed and approved by executive.
• Hire local staff, if additional personnel are required.
• Train staff regularly on sustainability policies and ensure they can communicate policies to stakeholders and attendees.

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Communicate (EVENT) written environmental objectives and performance criteria to staff

Have sustainability policy signed and approved by executive.

Hire local staff when additional personnel is required

Train staff regularly on sustainability policies and ensure they can communicate policies to stakeholders and attendees

11.2.7 Water

• Request that suppliers capture and re-use rain runoff when possible and appropriate.
• Use drought tolerant native plants when possible and appropriate.
• Suppliers are to purchase environmentally preferable products.

11.2.8 Waste Management

• Support the goal of achieving a minimum diversion rate of 50% for the meeting.
• Recycling, Compost and Landfill bins are to be clearly marked; facilities for services are to be within 250 miles.
• Buy in bulk, minimize and reuse packaging when appropriate.
• Require pack in and pack out of materials from vendors and exhibitors. This means that vendors and exhibitors take out what they bring in and do not contribute to the waste stream of the event or the venue. This is responsible participation on the part of the vendor and exhibitor.

• Suppliers are to have a set waste reduction baseline, with a plan implemented to reduce waste annually against the baseline.

• FOG be captured and be recycled (animal and vegetable Fats, Oils, and Grease)

• Recycling program, including composting, is implemented and recycling bins are provided in both FOH & BOH. (Front and Back of House)

• Use reusable service-ware during the event.

• Provide drinking water in bulk dispensers or pitchers, not individual single use plastic water bottles.
12. ENERGY STAR Policy

12.1 Executive Summary

Energy Star eligible equipment should always be procured. Information Systems (IS) needs to advise the requestor that our policy is to seek Energy Star and assist them in finding properly rated products. If the requestor does not want to purchase Energy Star rated products, IS needs to be proactive in contacting BGREEN prior to a shopping cart being entered for the purchase. If the non-compliant equipment is selected, then Purchasing is required to document this purchase with an explanation in the Purchase Order. BGREEN will be conducting quarterly audits via a custom SAP report that documents adherence to this policy.

The Sustainability initiative at Bloomberg LP includes “Environmentally Preferred” purchasing guidelines. To meet carbon reduction goals and make environmentally friendly purchases, new equipment should be ENERGY STAR rated where opportunities exist. This rigorous policy will help to meet Bloomberg’s carbon emissions goals. For a complete list of items in which ENERGY STAR opportunities exist see below.

12.2 What is ENERGY STAR?

ENERGY STAR is a joint program of the U.S. Environmental Protection Agency and the U.S. Department of Energy helping businesses and people save money and protect the environment through energy efficient products and practices.

In 1992 the US Environmental Protection Agency (EPA) introduced ENERGY STAR as a voluntary labeling program designed to identify and promote energy-efficient products to reduce greenhouse gas emissions. Computers and monitors were the first labeled products. The ENERGY STAR label is now on over 50 product categories including major appliances, office equipment, lighting, and home electronics. EPA has also extended the label to cover new homes and commercial and industrial buildings.

12.3 Why choose ENERGY STAR?

ENERGY STAR products save 20%-30% off electricity bills on average. Implementing ENERGY STAR products will also improve Bloomberg LP’s energy performance ratings. ENERGY STAR energy performance ratings have been incorporated into green building standards, such as LEED for Existing Buildings.
12.4 How do items qualify for ENERGY STAR? (see exhibit 1)

12.4.1 Televisions

Earning the ENERGY STAR means a product meets strict energy efficiency guidelines set by the US Environmental Protection Agency and the Department of Energy. For TVs, it means they save energy both in standby and active (when they're on) modes. ENERGY STAR qualified TVs use about 30% less energy than standard units.

12.4.2 Computers

Desktop and notebook (laptop) computers, integrated computer systems, desktop-derived servers and workstations are all eligible to earn the ENERGY STAR. Those that come with the label are more efficient. EPA has strengthened the requirements for earning the ENERGY STAR rating to meet energy use guidelines in three distinct operating modes: standby, active, and sleep modes. This ensures energy savings when computers are being used and performing a range of tasks, as well as when they are in standby. ENERGY STAR qualified computers must also have a more efficient internal power supply. Since computers are in use more hours per day than they used to be, power management is important to saving energy. ENERGY STAR power management features place computers (CPU, hard drive, etc.) into a low-power “sleep mode” after a designated period of inactivity. Low-power modes for computers reduce the spinning of the hard disk, which decreases power consumption. Simply hitting a key on the keyboard or moving the mouse awakens the computer in a matter of seconds. Most computers and workstations used in Bloomberg LP are qualified for ENERGY STAR, but it’s worth mentioning that notebook computers are not and have opportunities available.

12.4.3 Copiers & Fax Machines

Copiers and fax machines are the most energy-intensive type of office equipment because they are left on for long periods of time — in some cases, 24 hours per day. ENERGY STAR qualified imaging equipment delivers the same performance as less efficient, conventional equipment and is, on average, 25% more efficient. Copiers that have earned the ENERGY STAR not only use less energy, but also power down when not in use, and use about half of the electricity of standard models. ENERGY STAR qualified machines print double-sided pages, reducing both copying and paper costs. Efficient designs help ENERGY STAR equipment run cooler and last longer, so businesses that use these product may also save on air conditioning and maintenance.

12.4.4 Monitors/Displays

Computer monitors must meet stringent requirements in On, Sleep, and Off Modes in order to earn the ENERGY STAR.

In On Mode, the maximum allowed power varies based on the computer monitor’s resolution.

In Sleep Mode, computer monitor models must consume 2 watts or less.

In Off Mode, computer monitor models must consume 1 watt or less.

Enabling a monitor's power management features and turning it off at night not only saves energy, but also helps computer monitor equipment run cooler and last longer. Businesses that use ENERGY STAR enabled office equipment may realize additional savings on air conditioning and maintenance.

12.4.5 Printers, Scanners, and All-in-One Devices

On average, ENERGY STAR qualified imaging equipment that meets the new imaging equipment specification is 25% more efficient than conventional models. ENERGY STAR qualified print double-sided pages, reducing paper
costs. Efficient designs help ENERGY STAR equipment run cooler and last longer, so that use of these products may also save on air conditioning and maintenance.

### 12.4.6 Lighting

The ENERGY STAR is awarded to only certain bulbs that meet strict efficiency, quality, and lifetime criteria.

ENERGY STAR qualified compact fluorescent lighting uses 75% less energy and lasts up to ten times longer than normal incandescent lights.

**ENERGY STAR Qualified Light Emitting Diode (LED) Lighting:**

- Reduces energy costs — uses at least 75% less energy than incandescent lighting, saving on operating expenses.
- Reduces maintenance costs — lasts 35 to 50 times longer than incandescent lighting and about 2 to 5 times longer than fluorescent lighting. No bulb-replacements, no ladders, no ongoing disposal program.
- Reduces cooling costs — LEDs produce very little heat.
- Is guaranteed — comes with a minimum three-year warranty — far beyond the industry standard.
- Offers convenient features — available with dimming on some indoor models and automatic daylight shut-off and motion sensors on some outdoor models.
- Is durable — won’t break like a bulb.

To qualify for ENERGY STAR certification, LED lighting products must pass a variety of tests to prove that the products will display the following characteristics:

- Brightness is equal to or greater than existing lighting technologies (incandescent or fluorescent) and light is well distributed over the area lighted by the fixture.
- Light output remains constant over time, only decreasing towards the end of the rated lifetime (at least 35,000 hours or 12 years based on use of 8 hours per day).
- Excellent color quality. The shade of white light appears clear and consistent over time.
- Efficiency is as good as or better than fluorescent lighting.
- Light comes on instantly when turned on.
- No flicker when dimmed.
- No off-state power draw. The fixture does not use power when it is turned off, with the exception of external controls, whose power should not exceed 0.5 watts in the off state.
13. Vehicle Leasing Guidelines

13.1 Executive Summary

Field Service provides leased cars for technicians to visit customers where it is not practical to use public transportation because of response times and/or there is a requirement to transport equipment.

The following will act as a guideline to ensure that the leased vehicles are sourced in the most suitable way possible.

13.2 Site Requirements

A station wagon providing enough trunk space to transport current Bloomberg provided hardware for installation at customer locations, newsrooms and node-sites. 1 Flat Panel and 2 PCs including packaging are the current guideline. The minimum recommended trunk size is 500 Liters

13.3 Lease Duration

We suggest a guideline of 3 years. However shorter or longer leases (up to 5 years) are possible that allow us to switch to more sustainable technologies but also take economic benefits into consideration.

13.4 Considerations

Vehicles that meet the criteria for size and leasing will then be compared on the basis of fuel types, fuel efficiency, engine emission standards (EU 4, 5 etc.) and actual emissions (CO2 g/Km).