APPENDICES

PRODUCTS

12 Principles of Bloomberg News
Bloomberg News 5 F’s
List of Awards – Journalism
12 PRINCIPLES BLOOMBERG NEWS

• **It isn’t news if it isn’t true.** Accuracy is the most important principle in journalism. There is no such thing as being first with news if we’re wrong.

• **News is not a commodity.** The critical thinking we apply to reporting, writing and editing can make every story unique.

• **We are defined by our words.** Writing to the highest standard is in the best interests of the reporter, the editor, Bloomberg News and our customers.

• **Show, don’t tell.** Back up statements and assertions with facts, figures and anecdotes. Write with nouns and verbs; shun adjectives and modifiers.

• **News is a surprise.** What do we know today that we didn’t know yesterday? That question will offer guidance when deciding which facts to highlight first.

• **Names make news.** People want to read and hear about people—the actors and the victims. The bigger the name, the bigger the audience.

• **Not invented here.** We immediately report news from other organizations and then seek to advance the story. We don’t subscribe to the common journalistic belief that if we didn’t break the news, it didn’t happen.

• **Follow the money.** Explaining the role of money in all its forms—from capital flows to executive compensation to the cost of an acquisition to election spending—reveals the true meaning of the news.

• **One story for all.** Think globally, not locally. Write with a style and simplicity that anyone anywhere can understand.

• **The more we prepare, the luckier we will be.** We report, write and edit stories in advance so we’re prepared to deliver our best news judgment, which is what readers, listeners and viewers want and need most at the moment their interest is greatest.
BLOOMBERG NEWS FIVE F’S
Bloomberg News is defined by these five ‘Fs’:

• **Factual word.** Be the most factual. Rely on nouns and verbs, because they are more precise than adjectives and adverbs. Strive for 100% accuracy. Use the Bloomberg Terminal to obtain facts and context, and use our reporting to develop anecdotes. We want to impress with the quality of our information, not the intricacy of our prose.

• **First word.** Be the first to report the news. This is essential to satisfy our audience, whose livelihoods depend on the timeliness of information. It’s easiest to be first if we develop the necessary sources and knowledge in advance of the news. We also have to provide the fastest delivery of key information from news sources that are readily accessible to our rivals, such as economic reports and corporate releases.

• **Fastest word.** Be the fastest to report the details. Because Bloomberg operates 24 hours a day, seven days a week, we can deliver stories faster than news organizations that publish once a day, once a week or once a month. By being prepared, we can beat others every time with the latest facts, anecdotes and examples. Through the last update of a story, make every effort to provide the supporting information before anyone else.

• **Final word.** Be the definitive source. At the end of a day, a Bloomberg News story ought to have as much context and perspective as any account published by major newspapers, if not more. It should be worthy of publication in any of the hundreds of newspapers worldwide that receive our stories.

• **Future word.** Explain today’s news in the context of tomorrow’s. What does an event indicate? The answer is often vital to people deciding whether to buy, sell or hold stocks, bonds, currencies or commodities, because future events will determine whether their decisions are right or wrong. They need to know what they can expect, and they will have an appetite for our stories if we tell them.
# LIST OF AWARDS (JOURNALISM)

## ENVIRONMENTAL & SOCIAL JOURNALISM REPORTING AWARDS

<table>
<thead>
<tr>
<th>Organization</th>
<th>Winning Category</th>
<th>Article</th>
<th>Date</th>
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<tbody>
<tr>
<td><strong>OPEC Award for Journalism</strong></td>
<td>Best-in-Business Contest</td>
<td>1. &quot;Cash, Criminals and Human Organs&quot;</td>
<td>Dec 2011</td>
<td>Michael Smith, Darya Krasnolutska and David Glovin</td>
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<td></td>
<td>3. &quot;Habitat for Humanity“</td>
<td>3. &quot;Try This&quot;, &quot;Can This Man Save the Bank of America“. &quot;Occupy Wall Street&quot;</td>
<td>July 2011</td>
<td>Stephanie Baker</td>
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<td></td>
<td>Explanatory</td>
<td>9. &quot;Mother India Starves Her Children&quot;, &quot;Hunger Stalks My Father’s India Long After Starvation Banished&quot;, &quot;Poor in India Starve as Politicians Steal $14.5 Billion of Food”, “Early Health Assured in India Where 900 Million Don’t Eat Enough”, “India Sees Children Dying as $2 Billion Program Proves Defective”, “India Minister Denies Theft Rampant in $14 Billion Food Program”</td>
<td>2012</td>
<td>Mehul Srivastava, Andrew MacAskill and Adi Narayan</td>
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<tr>
<td></td>
<td>Explanatory</td>
<td>14. &quot;Supreme Court Health Care Decision”, &quot;Obama’s Health-Care Overhaul Upheld by U.S. Supreme Court&quot;, &quot;Roberts Rejects Court Partisanship in...&quot;</td>
<td>2012</td>
<td>Greg Stohr, William Selway, Alex Wayne, Julianna Goldman and John McCormick</td>
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<tr>
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<td>Explanatory</td>
<td>16. &quot;Supreme Court Health Care Decision”, &quot;Obama’s Health-Care Overhaul Upheld by U.S. Supreme Court&quot;, &quot;Roberts Rejects Court Partisanship in...&quot;</td>
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<td>Greg Stohr, William Selway, Alex Wayne, Julianna Goldman and John McCormick</td>
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<td>Explanatory</td>
<td>18. &quot;Supreme Court Health Care Decision”, &quot;Obama’s Health-Care Overhaul Upheld by U.S. Supreme Court&quot;, &quot;Roberts Rejects Court Partisanship in...&quot;</td>
<td>2012</td>
<td>Greg Stohr, William Selway, Alex Wayne, Julianna Goldman and John McCormick</td>
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<td>20. &quot;Supreme Court Health Care Decision”, &quot;Obama’s Health-Care Overhaul Upheld by U.S. Supreme Court&quot;, &quot;Roberts Rejects Court Partisanship in...&quot;</td>
<td>2012</td>
<td>Greg Stohr, William Selway, Alex Wayne, Julianna Goldman and John McCormick</td>
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</tbody>
</table>
Backign Obama Health Law", "Health Care for Poor Challenges Republican States After Ruling", "Obama's Supreme Court Win May Help Him Now More Than November", "Two Surprises Give Obama High Court Victory on Health Care"


13. "Son Who Hears Voices Finds Health Care Fatally Dysfunctional"

14. "Wall Street's Big Swingers Get the Biggest Breaks", "Wall Street Finds Friends Can Help Scrub Records", "There's No Business Like the Brokerage Business", "'Dumb Money' is Staring Most of Us In the Face"

15. Bloomberg Markets: July, September and October 2012

16. "Danger on Your Dinner Plate"

17. "The Scourge of the Superbugs"

18. "Blowing the Whistle on Citi"

19. "Tech's Tragic Secret"

20. "You're So Bain", "The End is Coming", "The Leisure Gap"

OVERSEAS PRESS CLUB AWARDS

1. WINNER: ED CUNNINGHAM AWARD – Best Magazine Reporting
   2. Morton Frank Award – WINNER
   3. Morton Frank
   1. April 2011
   4. 2012
   5. 2012
   6. 2012
   1. Charles Graeber
   2. Michael Riley and Ashlee Vance
   3. Brett Forrest
   4. Michael Forsythe, Shai Oster, Natasha Khan,

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<table>
<thead>
<tr>
<th>Award</th>
<th>Citation</th>
<th>Winner</th>
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<td>4.</td>
<td>Best Investigative Reporting</td>
<td>WINNER</td>
<td>Dune Lawrence, Ben Richardson, Henry Sanderson</td>
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<td>5.</td>
<td>The Malcom Forbes Award</td>
<td>CITATION</td>
<td>Liam Vaughan, Gavin Finch, Andrea Tan, Katie Linsell, Jesse Westbrook, Lindsay Fortado and Joshua Gallu</td>
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<td>6.</td>
<td>the Madeline Dane Ross Award</td>
<td>CITATION</td>
<td>Alan Katz, Michelle Wiese Bockmann, Alaric Nightingale, Rob Sheridan</td>
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**Bloomberg 2013 Report Update**

<table>
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<tr>
<td>2.</td>
<td>SECOND PLACE – Business Reporting/Small Magazines</td>
<td>2. Small Magazines</td>
<td>Andrea Gerlin</td>
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**Out of U.S. Companies**

- "Empire at the End of the Earth", "Gazprom Bovanenkovo Natural-Gas Field Fuels Putin Power: Energy"
- "Libor - the Biggest Bank Scandal", "Rigged Libor With Policemen Nearby Shows Flaw of Self-Regulation", "Libor Probe Said to Expose Collusion, Lack of Internal Controls", "Life as Libor Traders Knew It Seen as Abusive by Investigators", "Libor Flaws Allowed Banks to Rig Key Rate Without Conspiracy", "RBS Managers Condoned Libor Manipulation Amid Goodwin Expansion", "RBS Instant Messages Show Libor Rates Skewed With Traders"
- "High Seas Injustice", "Piracy Lethal for Innocent as Nations Shoot First on Tankers", "Shooting to Kill Pirates Risks Blackwater Moment on High Seas", "Brother Shot Dead Fishing Tests Armed Guards’ Accountability"

**AHCJ (Association of Health Care Journalists)**

| 1. | SECOND PLACE – Investigative/Small Magazines | Small Magazines | "Crime and Human Organs" |
| 2. | SECOND PLACE – Business Reporting/Small Magazines | Small Magazines | "Lethal Commerce" |
| 3. | THIRD PLACE – Public Health – Small Magazines | Small Magazines | "Desperate Americans Buy Kidneys From Peru Poor in Fatal Trade" |

2. Apr 2012
3. Nov 2012

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### NYSSCPA Excellence in Journalism Awards

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<tr>
<td>Investigative Reporting/Magazines</td>
<td>&quot;Lethal Commerce&quot;, &quot;Cash, Criminals &amp; Human Organs&quot;, &quot;Kidney Broker Pleads Guilty in First U.S. Organ Traffic Case&quot;</td>
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<tr>
<td>Magazine Reporting</td>
<td>&quot;Connecticut's Ribbon of Hardship&quot;</td>
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<tr>
<td>Online New Analysis</td>
<td>&quot;Wall Street's Big Swingers Get the Biggest Breaks&quot;, &quot;Wall Street's Legal Magic Ends an America Right&quot;, &quot;There's No Business Like the Brokerage Business&quot;</td>
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<td>Sports Reporting</td>
<td>&quot;Rutgers Football Fails Profit Test as Students Pay $1,000&quot;</td>
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<td>Arts and Culture</td>
<td>&quot;Wicked' Writers Earn More Than $95 Million for Global Smash&quot;</td>
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### SOCIETY OF THE SILURIANS

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**Cam Simpson**
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<th>Organization</th>
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<th>Date</th>
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<tr>
<td>MEDILL MEDAL FOR COURAGE IN JOURNALISM</td>
<td>Finalist</td>
<td>“See Above”</td>
<td>2011</td>
<td>Michael Smith</td>
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<tr>
<td>NATIONAL HEADLINER AWARDS</td>
<td>1. Health, Medical and Science Reporting –</td>
<td>1. “Profit and Neglect in Hospice Care”</td>
<td>2012</td>
<td>1. Peter Waldman</td>
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<td></td>
<td>6. Education Writing by an Individual or Team – THIRD PLACE</td>
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<tr>
<td>Sigma Delta Chi Awards</td>
<td>1. WINNER – Non-Deadline Reporting</td>
<td>1. See Above</td>
<td>1. 2012</td>
<td>1. See Above</td>
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<td></td>
<td>3. Non-daily publication, Business magazine/newspaper circulation more than 20,000</td>
<td>3. Same as (2)</td>
<td></td>
<td>3. Same as (2)</td>
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<tr>
<td></td>
<td>5. Business Reporting Circulation less than 250,000</td>
<td>5. “Oil Companies Revive Hunt for Crude in Area Fouled by BP Spill”</td>
<td></td>
<td>5. Joe Carroll, Edward Klump, Jim Snyder and Stanley Reed</td>
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<td>10. Elizabeth Campbell, Leslie Patton, Tim Jones,</td>
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<tr>
<td>NAAJ (North American Agricultural Journalists) Writing Award</td>
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<tr>
<td>4. Spot News – THIRD PLACE (tie)</td>
<td>• &quot;Texas Dust-Bowl Redux Spurs Record</td>
<td>4. Jane Smith, John Doe</td>
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**Newspaper, circulation more than 250,000 – WINNER**

9. Feature Writing, Online

10. Feature Writing, Daily Newspaper, circulation more than 250,000

11. Deadline Reporting, Specialty/Trade

12. Non-Deadline Reporting, Specialty/Trade

13. Non-Daily Newspaper or Magazine Circulation above 250,000

14. Business Reporting, Daily Newspaper circulation more than 250,000

15. Business Reporting, Non-daily Publication, Circulation above 20,000

16. Business Reporting, Specialty/Trade


11. "Hurricane Sandy Coverage"

12. "Income Equality"

13. "Food Safety: Danger on Your Dinner Plate"

14. "Online Furor Over 'Pink Slime' Means Disaster for Meat Innovator"

15. "Deere Made-in-America Tractors Plow Brazil Soil as Farms Upgrade"

16. "Fall of Peregrine's Wasendorf Presaged in Christmas Toast", "Wasendorf Dream Building Languishes After Peregrine's Collapse"
<table>
<thead>
<tr>
<th>U.S. Cotton Loss, Farm Claims</th>
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<tbody>
<tr>
<td>• &quot;Texas Dust Bowl Drives Cotton Rally as Rick Perry Prays for Rain&quot;</td>
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<td>• &quot;Record Texas Drought Burns Cotton Farmers as White Gold Withers&quot;</td>
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<td>• &quot;Water-Starved Texas Rice Crops Erode U.S. Harvest as Prices Gain&quot;</td>
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<td>• &quot;Texas Faces Billions in Water Costs as Drought Imperils Economy&quot;</td>
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<td>3. &quot;Mad Cow Disease&quot;</td>
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<tr>
<td>• &quot;U.S. Investigating Allegations of Downed Cow in California Plan&quot;</td>
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<tr>
<td>• &quot;Mad Cow Case Confirmed in Central California, USDA Says&quot;</td>
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<tr>
<td>• &quot;Cattle Tumble Most in 11 Months as Mad-Cow Disease Found in U.S&quot;</td>
</tr>
<tr>
<td>• &quot;Testing for Mad Cow Disease Falls 90% Since 2005, USDA Says&quot;</td>
</tr>
<tr>
<td>• &quot;Farmers at Center of Mad Cow Probe Grumble Over Tainted Image&quot;</td>
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<tr>
<td>• &quot;Mad Cow Case Seen as No Bar to Record Beef Exports: Commodities&quot;</td>
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<td>• &quot;U.S. Lags in Cattle ID Seen as More Effective Than Mad Cow Test&quot;</td>
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<tr>
<td>4. &quot;Mad Cow Case Confirmed in Central California, USDA Says&quot;</td>
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Bjerga, Elizabeth Campbell and Michael Marois

4. Allan Bjerga
**NEW YORK PRESS CLUB AWARDS**

2. Spot News Magazine – WINNER
3. Consumer Reporting-Magazine – WINNER
4. Political Coverage- Magazines
5. Crime Reporting – Newswire – WINNER
6. Special Superstorm Sandy Award : Continuing Coverage – Magazine
7. Special Superstorm Sandy Award : Continuing Coverage- Newswire - WINNER

**LOS ANGELES PRESS CLUB SOUTHERN CALIFORNIA JOURNALISM AWARDS**

1. Entertainment Commentary/Reviews
2. Political Commentary
3. Magazine – Investigative – FIRST PLACE
4. Online Database-Driven Journalism – THIRD PLACE
5. Online Investigative – FINALIST
6. Online Feature- FINALIST

**SAJA: South Asia Journalism Awards**

1. Outstanding Enterprise reporting about South Asia or the worldwide South Asian diaspora – FINALIST
2. Outstanding Feature Story about S. Asia or the worldwide S. Asian diaspora – WINNER
3. Outstanding Enterprise Reporting about S. Asia or the worldwide S. Asian diaspora – FINALIST
4. Outstanding Business Story About S. Asia or the worldwide S. Asians diaspora.

**SOCIETY OF PUBLISHERS IN ASIA (SOPA) AWARDS**

1. Breaking News – WINNER
2. Business Reporting – SECOND PLACE

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**Bloomberg 2013 Report Update**

1. "See Above"
2. "Nothing To Do But Start Again"
3. "The Scourge of the Superbugs"
4. "Inside Karl Rove's Billionaire Fundraiser"
5. "Unsafe at Any Bitrate"
6. "Starting Over: A Pet Food Store Fights to Survive Sandy"
7. "The Northeast in Ruins: Covering Superstorm Sandy"

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**LOS ANGELES PRESS CLUB SOUTHERN CALIFORNIA JOURNALISM AWARDS**

1. "Oprah, American Girls and Other Binge Dreamers"
2. "Need a Lightbulb? Uncle Sam Gets to Choose"
3. "Duping the Donors"
4. "Los Angeles’s $100,000 Carpenters Show Clout of Utility’s Union"
5. "America's Great State Payroll Giveaway"
6. "Asian Buyers Buoy New-Home Demand in California’s Orange County”

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**Society of Publishers in Asia (SOPA) Awards**

1. Josh O’Connor
2. Mehul Srivastava
3. Mehul Srivastava, Andrew MacAskill and Adi Narayan
4. Mehul Srivastava and Andrew MacAskill

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**Bloomberg 2013 Report Update**

1. "INSIDE JAPAN’S NUCLEAR DISASTER"
2. "Japan Disaster Caps Decades of Faked"
### Bloomberg 2013 Report Update

#### National Press Club Awards

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<thead>
<tr>
<th>Award</th>
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<tr>
<td>1. Ryle Geriatric Writing Award</td>
<td>Peter Waldman</td>
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<tr>
<td>2. Consumer Journalism: Periodicals</td>
<td>Stephanie Armour, John Lippert and Michael Smith</td>
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<tr>
<td>3. Consumer Journalism: Newspapers</td>
<td>Peter Waldman and Sydney P. Freeberg</td>
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<tr>
<td>4. Joan M. Friedenberg Online Journalism</td>
<td>Michael Forsythe, Shai Oster, Natasha Khan, Dune Lawrence, Neil Western, Ben Richardson and Peter Hirschberg</td>
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<td>5. Sandy Hume Award for Reporting on</td>
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<table>
<thead>
<tr>
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<tbody>
<tr>
<td>1. Journalist of the Year</td>
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<tr>
<td>2. Human Right Reporting</td>
<td>WINNER</td>
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<tr>
<td>3. Explanatory Reporting</td>
<td>WINNER</td>
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<tr>
<td>4. Feature Writing</td>
<td>WINNER</td>
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<td>5. Investigative Reporting</td>
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<tr>
<td>6. Business Reporting</td>
<td>HONORABLE MENTION</td>
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<td>7. The Scoop Award</td>
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- **Journalist of the Year**
  - "Nuclear Warriors Find Respite on Ship in Fight to Avert Meltdown"
- **Human Right Reporting**
  - "Japan’s Terrifying Day Saw Unprecedented Exposed Fuel Rods"
  - "Fukushima Desolation Worst Since Nagasaki as Population Flees"
  - "Japan’s Deal with Devil"
- **Explanatory Reporting**
  - "Japan Pulling Plug on Nuclear Age Risks $5 Trillion Economy"
  - "Toyota Losing No. 1 Makes Prius Priority as Japan Inc. Fades"
- **Feature Writing**
  - "Japan’s Traders Target $200 Billion Power Market After Fukushima"
  - "Nuclear Regulator Dismissed Seismologist on Japan Quake Threat"
- **Investigative Reporting**
  - "Nuclear Warriors Find Respite on Ship in Fight to Avert Meltdown"
  - "Japan’s Terrifying Day Saw Unprecedented Exposed Fuel Rods"
  - "Fukushima Desolation Worst Since Nagasaki as Population Flees"
  - "Japan’s Deal with Devil"
  - "Tepco’s ‘Deal With Devil’ Signals End to Japan’s Postwar Era"
  - "Japan Pulling Plug on Nuclear Age Risks $5 Trillion Economy"
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<th>Award</th>
<th>Winner</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Ryle Geriatric Writing Award</td>
<td>Peter Waldman</td>
</tr>
<tr>
<td>2. Consumer Journalism: Periodicals</td>
<td>Stephanie Armour, John Lippert and Michael Smith</td>
</tr>
<tr>
<td>3. Consumer Journalism: Newspapers</td>
<td>Peter Waldman and Sydney P. Freeberg</td>
</tr>
<tr>
<td>4. Joan M. Friedenberg Online Journalism</td>
<td>Michael Forsythe, Shai Oster, Natasha Khan, Dune Lawrence, Neil Western, Ben Richardson and Peter Hirschberg</td>
</tr>
<tr>
<td>5. Sandy Hume Award for Reporting on</td>
<td></td>
</tr>
</tbody>
</table>
Politics – HONORABLE MENTION

6. Michael A. Dornheim Award for Aviation Reporting

Congresswoman With Plan", "Food-Safety Victims That Laud U.S. Rules Say Funding’s a Concern"

3. "Dental Abuse Seen Driven by Private Equity Exploiting Care Firms", "Prostate Patients Suffer as Money Overwhelms Optimal Therapy", "Silicon Valley Surgeons Risk 'Moral Authority' for 200% Returns", "For-Profit Nursing Homes Lead in Overcharging While Care Suffers", "Dental Abuse of Poor Kids Paid by U.S. Dodges Toughest Penalties"


6. "Zombie Towers and Other Aviation Dangers"

FRONT PAGE AWARDS

1. Martha Coman Best New Journalist Award
2. Wires/Beat Reporting – WINNER
3. Spot Reporting
4. Specialized Reporting, Business
5. Specialized Reporting, Medicine/Health/Fitness

1. "Toughest U.S. Abortion Law Nears Passage in Mississippi Vote", "Curbing Female Reproductive Rights Raises Taxpayer Costs"
2. "Ex-SAC Capital Manager Tells FBI Fund Used Insider Information", "SAC Manager Said to Be"

1. Esme Deprez
2. Patricia Hurtado, Katherine Burton and Saijel Kishan
3. Asjylyn Loder and Esmé E. Deprez
4. Mina Kimes
5. Susan Berfield
### Bloomberg 2013 Report Update

#### Uncharged Insider Trading Conspirator
- "Ex-SAC Analyst Horvath Pleads Guilty in Insider-Trading Case"
- "SAC E-Mails Show Cohen Consulted on Trade at Heart of Probe", "Cohen Is Said to Remain Silent in Insider-Trading Probe"
- "Boston Bombing Victim in Iconic Photo Helped Identify Attackers"
- "Oberhelman Enriched by Caterpillar Growth as Worker Pay Stalls", "Lampert's Hunger Games Force Sears Bosses to Fight For Scraps"
- "Stem Cell Showdown: Celltex vs. the FDA"

#### EMMA Awards
- Exceptional Internet Story
  - See Above, "Afghan Women Tolerate Beating for Cell Phones in Emerging Market"

#### NIHCM (National Institutes of Health Care Management)
- General Circulation
  - "Profit and Neglect in Hospice Care"
    - "Preparing Americans for Death Hospices Neglect End of Life"
    - "Aunt Midge Not Dying in Hospice Reveals $14 Billion U.S. Market"
    - "Hospice Turns Months-to-Live Patient Into Years of Abusing Drugs"
    - "Whistleblower Accuses Chemed Unit of Medicare HMO Conspiracy"

#### Eppy Awards
- NA – FINALIST
  - See Above

#### Foreign Press Awards
- 1. Financial/Economy Story of the Year – FINALIST
  - "Tech's Tragic Secret"
- 2. Story of the Year by a Member of the FPA- WINNER
  - "Empire Builder"
- 3. Science Story of the Year – FINALIST
  - "Danger on Your Dinner Plate"
- 1. 2012
  - 2. 2013
  - 3. 2012

- 1. Cam Simpson
- 2. Stephanie Baker
- 3. Stephanie Armour, John Lippert, Michael Smith
| NATIONAL PRESS FOUNDATION – FEDDIE AWARDS | NA | 1. Women’s Programs Face Deep Cuts as States Tackle Budget Deficits  
2. 2013  
3. 2013 | 1. Alison Vekshin  
2. Mark Drajem and Jack Kaskey |
| GEORGE POLK AWARD | 1. International Reporting  
• “Capitalism From Citic Founder to Godfather of Golf”  
• “Chinese in Ann Arbor Voted Obama in Elite Family of Mao’s Rulers”  
• “Mapping China’s Red Nobility”  
• “Xi Jinping Millionaire Relations Reveal Elite Chinese Fortunes”  
• “China Murder Suspect’s Sisters Ran $126 Million Business Empire”  
• “Bo Xilai Clan Links Included Citigroup Hiring of His Elder Son”  
• “Bo Son Denying Personal Gain Says Father Demise Ruined His Life”  
• “China’s Billionaire Lawmakers Make U.S. Peers Look Like Paupers”  
• “Bo Ouster Threatens Model Crafted to Narrow China Wealth Gap”  
• “Bo Xilai Downfall Reveals Crony Communism Widening Rich-Poor Gap”  
• “Murder Case Illuminates China’s Communist Problem”  
2. “Indentured Students”  
• “Obama Relies on Debt Collectors Profiting From Student Loan Woe”  
• “Taxpayers Fund $454,000 Pay for Collector Chasing Student Loans”  
• “Schoolteacher’s Drained Bank Account Shows U.S. Hitting Defaults”  
• “Colleges Confuse Students With Letters Offering Aid That’s Debt”  
• “Indentured Students Jump as U.S. Loans Corrode Education Ticket” | 2012 | 1. Shai Oster, Michael Forsythe, Natasha Khan, Dune Lawrence, Henry Sanderson, Ben Richardson, Vinicy Chan, Wenxin Fan, Yidi Zhao, Kevin Hamlin, Dingmin Zhang, William Pesek  
2. John Hechinger and Janet Lorin |
<table>
<thead>
<tr>
<th>Award</th>
<th>Category</th>
<th>Entry</th>
<th>Year</th>
<th>Author(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>HILLMAN FOUNDATION</td>
<td>Sidney Award</td>
<td>&quot;McDonald’s $8 Man Serving $8.75 Million CEO Shows Pay-Gap Surge&quot;</td>
<td>2012</td>
<td>Leslie Patton</td>
</tr>
<tr>
<td>--------------------------</td>
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<td>-------------------------------------------------</td>
<td>----------------------------</td>
<td>-----</td>
</tr>
</tbody>
</table>

*Report Update: That Might Never Arrive
- "Transparency Outsourced as U.S. Hires Vendors for Disclosure Aid"
- "Obama Pursuing Leakers Sends Warning to Whistle-Blowers"
- "Obama Leak Crackdown Turns High-Paid Expert into Hourly Clerk"
- "Pentagon May Limit Information Requests Handled by Outside Firms"
- "Regulators Avoiding 'La-La Land' Fly Coach, With Some Exceptions"
- "Obama Fails to Deliver Transparency as Cabinet Defies Requests"
- "Obama Openness Promise Belied as Disclosure Suits Outpace Bush"
2. David Voreacos  
3. Susan Antilla |
| --- | --- | --- | --- |

| IRE: INVESTIGATIVE REPORTERS AND EDITORS AWARD | 1. Multiplatform, Large - FINALIST "Revolution to Riches" | 1. 2012 | 1. Michael Forsythe, Fan Wenxin, Shai Oster, Dune Lawrence, Natasha Khan, Michael Wei, Yidi Zhao, Henry Sanderson, Neil Western, Peter Hirschberg, Ben Richardson, Melissa Pozsgay, Anne Swardson, Chloe Whiteaker and Phil Kuntz |

| HONG KONG JOURNALISTS ASSOCIATION | 1. Human Rights Award - WINNER "Mother India Starves Her Children"  
- "Hunger Stalks My Father’s India Long After Starvation Banished"  
- "Poor in India Starve as Politicians Steal $14.5 Billion of Food "  
- "Early Death Assured in India Where 900 Million Don’t Eat Enough "  
- "India Sees Children Dying as $2 Billion Program Proves Defective"  
- "India Minister Denies Theft Rampant in $14 Billion Food Program" | 1. 2012 | 1. Mehul Srivastava, Andrew MacAskill and Adi Narayan |

2. Tim Higgins and Jeff Green |
| --- | --- | --- | --- |
| PENNSYLVANIA WOMEN’S PRESS ASSOCIATION | 1. Education – FIRST PLACE  
2. “Pennsylvania Bond-Cost Climb Shows Pension Penalty: Muni Credit” | 1. May 2012  
2. Romy Varghese |
| GERALD LOEB AWARDS | 1. Beat Reporting – FINALIST  
2. Breaking News - FINALIST  
3. International Reporting – FINALIST  
4. International Reporting – FINALIST  
5. Magazines – FINALIST  
6. Magazines – FINALIST  
2. “Glencore/Xtrata: Deal of the Year”  
3. “Mother India Starves Her Children”  
4. “Revolution to Riches”  
5. “Duping the Donors” – Bloomberg Markets  
6. “Marriage at 30,000 Feet (United/Continental Merger)” – Bloomberg Businessweek  
2. 2012  
3. 2012  
4. 2012  
5. 2012  
6. 2012 | 1. Staff of Bloomberg News  
2. Elizabeth Berhmann, Brett Foley, Firat Kayakiran, Jesse Riseborough, Zachary R. Mider, Matthew Campbell, Simon Casey, Kevin Crowley and Jacqueline Simmons  
3. Mehul Srivastava, Andrew MacAskill and Adi Narayan  
4. Michael Forsythe, Shai Oster, Natasha Khan, Dune Lawrence, Ben Richardson and Henry Sanderson, Wenvin Fan, Michael Wei, Chloe Whiteaker and Phil Kuntz  
5. David Evans  
6. Drake Bennett  
7. Jana Randow, Jeff Black, Gabi Thesing, Anchalee Worrachate, Simon Kennedy, James G. Neuger |
| NAREE AWARDS | 1. Best Commercial Report or Feature - GOLD WINNER  
2. Best Commercial Report or Feature – SILVER WINNER  
2. “Lehman Lives to Pay 18 Cents on Dollar With New Sales: Mortgages”  
2. Aug 2012  
2. Oshrat Carmiel  
3. John Gittelsohn and Prashant Gopal |
### NJ SPJ JOURNALISM CONTEST

<table>
<thead>
<tr>
<th>Place</th>
<th>Category</th>
<th>Winner</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.</td>
<td>Online Feature Reporting – SECOND PLACE</td>
<td>&quot;Hurricane Sandy Enterprise Pieces&quot;</td>
<td>2012</td>
</tr>
<tr>
<td>3.</td>
<td>Online State or Regional News – SECOND PLACE</td>
<td>&quot;Christie's Biggest Fight May Be Weight as Job Strains Willpower&quot;</td>
<td>2012</td>
</tr>
<tr>
<td>4.</td>
<td>Online Sports Reporting- THIRD PLACE</td>
<td>&quot;Rutgers Football Fails Profit Test as Students Pay $1,000&quot;</td>
<td>2012</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Margaret Collins, Elise Young, Freeman Kloppott, Terrence Dopp, Chris Strom, Brian Sullivan, Tim Jones, James Rowley, Henry Goldman, Romy Varghese</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td>Terrence Dopp, Romy Varghese, Steven Church, Elise Young, Prashant Gopal, John Gittelsohn William Selway</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td>Elise Young</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td>Curtis Eichelberger and Elise Young</td>
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</table>

### SAN FRANCISCO PENINSULA PRESS CLUB

<table>
<thead>
<tr>
<th>Place</th>
<th>Category</th>
<th>Winner</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.</td>
<td>Print Business Story – FIRST PLACE</td>
<td>&quot;Chesapeake Conflict of Interest Seen in Thunder Playoffs&quot;</td>
<td>2012</td>
</tr>
<tr>
<td></td>
<td></td>
<td>David Wethe and Jim Polson</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td>David Wethe</td>
<td></td>
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</table>

### NATIONAL LESBIAN AND GAY JOURNALISM AWARDS

<table>
<thead>
<tr>
<th>Place</th>
<th>Category</th>
<th>Winner</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Journalist of the Year for 2013</td>
<td>Michael Luongo</td>
<td>2012</td>
</tr>
<tr>
<td>2.</td>
<td>Outstanding Feature Story – THIRD PLACE</td>
<td>&quot;West Bank's Nablus Wagers on Spices, Samaritans, Palaces: Travel&quot;, &quot;Belly Dancers in Cairo Clubs Flaunt Sensual Undulations: Travel&quot;</td>
<td>2012</td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td>Tiffany Kary</td>
<td></td>
</tr>
</tbody>
</table>

### SOCIETY OF ENVIRONMENTAL JOURNALISTS

<table>
<thead>
<tr>
<th>Place</th>
<th>Category</th>
<th>Winner</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Outstanding Feature Story – THIRD PLACE</td>
<td>&quot;Toxic Tribulations&quot;</td>
<td>2012</td>
</tr>
<tr>
<td>2.</td>
<td>Print Business Story – FIRST PLACE</td>
<td>&quot;Chesapeake Conflict of Interest Seen in Thunder Playoffs&quot;</td>
<td>2012</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Curtis Eichelberger and Charles R. Babcock</td>
<td></td>
</tr>
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</table>

### HOUSTON PRESS CLUB LONE STAR AWARDS

<table>
<thead>
<tr>
<th>Place</th>
<th>Category</th>
<th>Winner</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Enterprise – SECOND PLACE</td>
<td>&quot;Pakistan Women Serve Burgers, Run Corporations as Culture Opens&quot;</td>
<td>2012</td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td>Naween Mangi</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td>Faseeh Mangi</td>
<td></td>
</tr>
</tbody>
</table>

### FOOTBALL WRITERS ASSOCIATION OF AMERICA

<table>
<thead>
<tr>
<th>Place</th>
<th>Category</th>
<th>Winner</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.</td>
<td></td>
<td>Curtis Eichelberger and Charles R. Babcock</td>
<td></td>
</tr>
</tbody>
</table>

### PAKISTAN - AGAHI AWARDS

<table>
<thead>
<tr>
<th>Place</th>
<th>Category</th>
<th>Winner</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Competitiveness – WINNER</td>
<td>&quot;Pakistan Women Serve Burgers, Run Corporations as Culture Opens&quot;</td>
<td>2012</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Naween Mangi</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td>Faseeh Mangi</td>
<td></td>
</tr>
</tbody>
</table>
### ICIJ

<table>
<thead>
<tr>
<th>1.</th>
<th>Daniel Pearl Award - FINALIST</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>1.</th>
<th>“Revolution to Riches”</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>1.</th>
<th>2012</th>
</tr>
</thead>
</table>

1. Michael Forsythe, Shai Oster, Natasha Khan, Dune Lawrence, Wexin Fan Ben Richardson, Henry Sanderson and Michael Wei

### LA PRESS CLUB NATIONAL ENTERTAINMENT JOURNALISM AWARDS

<table>
<thead>
<tr>
<th>1.</th>
<th>Online News-WINNER</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.</td>
<td>Journalist of the Year - WINNER</td>
</tr>
<tr>
<td>3.</td>
<td></td>
</tr>
</tbody>
</table>

1. “Turmoil at the L.A. Art Museum”
2. “News Corp. to Take Fox Off Air If Courts Back Aereo”, “Live Nation’s Azoff Resigns, Will Sell Shares to Liberty Media”, “NFL Network Scores Thursday Stripping Viewers From Prime-Time TV”, “CBS Derided for Appeal to Old Viewers Says 54 Is New 49: Retail”, “Rolling Stones Tickets Gather Moss With $600 Seats Unsold”

<table>
<thead>
<tr>
<th>1.</th>
<th>2012</th>
</tr>
</thead>
</table>

1. 2012/2013
2. Andrew Fixmer

1. Christopher Palmeri and Katya Kazakina

### GHANA GOLD AWARDS FOR BUSINESS JOURNALISM

<table>
<thead>
<tr>
<th>1.</th>
<th>Economic Reporting-FINALIST</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.</td>
<td>Financial Reporting – FINALIST</td>
</tr>
<tr>
<td>3.</td>
<td>Online Media of the Year- FINALIST</td>
</tr>
</tbody>
</table>

1. 2012

1. Moses Mozart Dzawu
2. Moses Mozart Dzawu
3. www.bloomberg.com
APPENDICES

PEOPLE

Equal Employment Opportunity Policy
Diversity Organization Affiliations
Internal Programs and External Partnerships
OUR EQUAL EMPLOYMENT OPPORTUNITY POLICY
As stated in Bloomberg's Global Core Guide:

Bloomberg is committed to a policy of attracting, retaining, developing and promoting the most qualified individuals without regard to race, color, religion, sex, national origin, ancestry, age, marital status, sexual orientation, gender identity, veteran status, disability, or any other classification protected by law in your region. As such, all applicants and employees are treated in a non-discriminatory manner with respect to all terms and conditions of employment.

This policy governs all aspects of employment, including recruitment, selection, job assignment, promotion, lay-off, recall from lay-off, training, education, social and recreation programs, transfer, compensation, discipline, termination, and access to benefits.

Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action up to and including termination of employment. Anyone who believes that he or she has been the subject of discrimination should contact his or her manager, a Professional Development representative, Melinda Wolfe, Dan Doctoroff, or Peter Grauer.
DIVERSITY ORGANIZATION AFFILIATIONS

In 2013, we attended the following diversity conferences and/or provided sponsorship to the following diversity organizations:

<table>
<thead>
<tr>
<th>Organization</th>
<th>Resource</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Society of Black Engineers</td>
<td>Convention attendance and job board use</td>
<td>Year-round</td>
</tr>
<tr>
<td>Out for Undergraduate Business Conference</td>
<td>Convention attendance and sponsorship</td>
<td>October 5, 2013</td>
</tr>
<tr>
<td>Out for Undergraduate Technology Conference</td>
<td>Convention attendance and sponsorship</td>
<td>October 19, 2013</td>
</tr>
<tr>
<td>National Association of Hispanic Journalists</td>
<td>Convention attendance and sponsorship</td>
<td>August 24-26, 2013</td>
</tr>
<tr>
<td>National Lesbian &amp; Gay Journalist Association</td>
<td>Convention attendance and sponsorship</td>
<td>August 22-25, 2013</td>
</tr>
<tr>
<td>Asian American Journalist Association</td>
<td>Convention attendance and sponsorship</td>
<td>August 21-24, 2013</td>
</tr>
<tr>
<td>South Asian Journalist Association (Combined with AAJA)</td>
<td>Convention attendance and sponsorship</td>
<td>August 21-24, 2013</td>
</tr>
<tr>
<td>iRelaunch</td>
<td>Convention attendance and sponsorship</td>
<td>October 2, 2013</td>
</tr>
<tr>
<td>Be a Hero Hire a Hero</td>
<td>Convention attendance and sponsorship</td>
<td>September 20, 2014</td>
</tr>
<tr>
<td>Grace Hopper Expo – Tucson, AZ</td>
<td>Convention attendance and sponsorship</td>
<td>October 2-5, 2013</td>
</tr>
<tr>
<td>Society of Women Engineers</td>
<td>Convention attendance and sponsorship</td>
<td>Year-round</td>
</tr>
<tr>
<td>Thurgood Marshall College Fund, Leadership Institute</td>
<td>Convention attendance and sponsorship</td>
<td>November 8-10, 2013</td>
</tr>
<tr>
<td>The LGBT Empowerment Center</td>
<td>Organization supported by BLP Philanthropy. Leverage their assistance with identifying candidates for open roles.</td>
<td>September 30, 2013</td>
</tr>
<tr>
<td>oSTEM at UIUC</td>
<td>Convention attendance and job board use</td>
<td>February 17, 2013</td>
</tr>
<tr>
<td>Hack’n Jill</td>
<td>Convention attendance and sponsorship</td>
<td>October 4, 2013</td>
</tr>
</tbody>
</table>
We source experienced women and underrepresented candidates from the following organizations:

<table>
<thead>
<tr>
<th>Organization</th>
<th>Organization</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Be a Hero Hire a Hero</td>
<td>South Asian Journalists Association</td>
<td>Lime Connect</td>
</tr>
<tr>
<td>100,000 Jobs Mission</td>
<td>Society of Women Engineers</td>
<td>American Corporate Partners</td>
</tr>
<tr>
<td>AsianDiversity</td>
<td>Prep for Prep</td>
<td>Lime Connect</td>
</tr>
<tr>
<td>Direct Employers Association Network</td>
<td>NYC FIRST</td>
<td>Professional Women’s Magazine</td>
</tr>
<tr>
<td>Grace Hopper</td>
<td>RallyPoint</td>
<td>Upwardly Global</td>
</tr>
<tr>
<td>Inner City Scholarship Fund</td>
<td>Asian American Journalists Association</td>
<td>National Center for Women &amp; Technology</td>
</tr>
<tr>
<td>Job Central</td>
<td>Careers and the Disabled</td>
<td>Jumpstart</td>
</tr>
<tr>
<td>Latpro</td>
<td>Posse Foundation</td>
<td>Thurgood Marshall College Fund</td>
</tr>
<tr>
<td>Shomex Professional and Diversity Career Expo</td>
<td>Howard University</td>
<td>Jackie Robinson Foundation</td>
</tr>
<tr>
<td>National Association of Hispanic Journalists</td>
<td>National Society of Black Engineers</td>
<td>National Association of Black Journalists</td>
</tr>
<tr>
<td>National Lesbian and Gay Journalist Association</td>
<td>Latinos for Hire</td>
<td>Association of Latino Professionals in Finance and Accounting</td>
</tr>
<tr>
<td>Hampton University</td>
<td>Millennium High School</td>
<td></td>
</tr>
</tbody>
</table>

We partner with the following nonprofit organizations in research and philanthropy projects:

<table>
<thead>
<tr>
<th>Organization</th>
<th>Organization</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Center for Talent Innovation</td>
<td>American Corporate Partners</td>
<td>South Asian Youth Action</td>
</tr>
<tr>
<td>Catalyst</td>
<td>The Women's STAR Forum</td>
<td>Association of Women in Finance</td>
</tr>
<tr>
<td>New York Women's Agenda</td>
<td>Gay Men's Health Crisis</td>
<td>Dress for Success</td>
</tr>
<tr>
<td>100 Women in Hedge Funds</td>
<td>Year Up</td>
<td>Young Women's Leadership Network</td>
</tr>
<tr>
<td>Upwardly Global</td>
<td>Lime Connect</td>
<td>Tanenbaum Center of Interreligious Understanding</td>
</tr>
<tr>
<td>Echoing Green</td>
<td>National Center for Women in Technology</td>
<td>Eagle Academy</td>
</tr>
<tr>
<td>American Chamber of Commerce in Japan</td>
<td>Women's Bond Club</td>
<td>The YWCA of Greater New York</td>
</tr>
<tr>
<td>Jackie Robinson Foundation</td>
<td>Stonewall</td>
<td>The Harlem Educational Activities Fund</td>
</tr>
<tr>
<td>National Council for Research on Women</td>
<td>God’s Love We Deliver</td>
<td>Albert Kennedy Trust</td>
</tr>
</tbody>
</table>
We work with the following charitable organizations to source interns from a variety of backgrounds:

<table>
<thead>
<tr>
<th>Lime Connect</th>
<th>Year Up</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Door</td>
<td>New York Times Scholarship</td>
</tr>
<tr>
<td>Ladders for Leaders</td>
<td>Posse Foundation</td>
</tr>
<tr>
<td>Bergen County Academies</td>
<td>Prep for Prep</td>
</tr>
<tr>
<td>Phipps</td>
<td></td>
</tr>
</tbody>
</table>
INTERNAL PROGRAMS AND EXTERNAL PARTNERSHIPS

Through external relationships and internal programs we focus on attracting, retaining and supporting a diverse workforce. Our external partnerships help us source and identify female talent as well as underrepresented groups, raise awareness of opportunities at Bloomberg and contribute towards thought leadership. These relationships fall into three categories:

- Attending diversity conferences and providing sponsorship to diversity organizations and cutting edge research initiatives
- Working with nonprofit organizations to source interns from a variety of backgrounds
- Working with external partners to source experienced candidates from underrepresented groups

Internal initiatives include:

- Management of three Bloomberg Communities (Employee Resource Group) – The Bloomberg Women’s, Black Professional and LGBT & Ally Communities
- Management of the Innovators Speaker Series -- featuring speakers around the globe, including clients, authors, executives, newsmakers, community leaders, and academics, discussing their approach to innovation, entrepreneurship, and client service
- Women’s initiatives -- including the Women’s Coaching Program in News, Speed Mentoring events, and Polished Presence for Success trainings
- Training curricula and curriculum design – incorporating D&I messaging and concepts into our global leadership curriculum and professional skills programs, including Unconscious Bias in Interviewing training

External relationships include strategic partnerships in each category listed below:

- 100 Women in Hedge Funds
- Abilities
- American Asian Journalists Association
- American Chamber of Commerce in Japan
- American Corporate Partners
- Association of Women in Finance in Tokyo
- Catalyst
- Digital Diversity Network
- Diversity in Asia Network
- Hack’n Jill
- Historically Black Colleges & Universities (HBCU’s)
- Institute for Sustained Dialogue
- Interbank and Foreign Firms D&I Roundtable in Asia
- International Institute for Sustained Dialogue
- Lean In Foundation
- National Center for Women & Information Technology (NCWIT)
- National Council for Research on Women
- New America Alliance
- OPEN Finance
- Out Leadership
- Posse Foundation
- South Asian Journalists Association
• Stonewall
• Tanenbaum Center for Interreligious Understanding
• The Center for Talent Innovation
• Women Corporate Directors
• Women’s Bond Club
• YWCA of the City of New York

Diversity Recruiting Partners
• 100,000 Jobs Mission
• Academy for Software Engineering
• American Asian Journalists Association
• Be a Hero Hire a Hero
• Black Girls Code
• Bronx Academy for Software Engineering
• Council of Urban Professionals
• Grace Hopper Celebration of Women in Computing Conference
• Hack N Jill
• Harlem Educational Activities Fund
• iRelaunch
• Jackie Robinson Foundation
• Lime Connect
• National Association of Hispanic Journalists
• National Association of Black Journalists
• National Lesbian and Gay Journalists Association
• Out for Undergraduate Business Conference
• Rare Recruitment
• South Asian Journalists Association
• Thurgood Marshall College Fund
• Upwardly Global
APPENDICES

PLANET

List of Awards – Environmental
Carbon Emissions Calculation Process
BGREEN Operations Guidelines
2013 FSC Chain of Custody Certification
Green Language in RFPs
Green Language in Contracts
Scraper Certificate of Compliance
Supplier Protocol of Ethical Behavior
Survey for Electronics Recyclers
General Standards of Conduct and Ethical Behavior
Bloomberg Supplier Code of Conduct
Global Core Guide
LIST OF AWARDS (ENVIRONMENTAL)

EPA GREEN POWER PARTNERSHIP

Bloomberg has twice (2009, 2012) been recognized by the Environmental Protection Agency for its commitment to Green Power. The awards serve to recognize the leading actions of organizations, programs, suppliers, and individuals that significantly advance the development of green power sources. Bloomberg currently ranks as the 25th largest producer of renewable energy credits in the United States.

LEADERSHIP IN ENERGY AND ENVIRONMENTAL DESIGN (LEED) OFFICES

All new and refurbished offices are built to LEED standards included but not limited to; recycling of construction waste, low VOCs, daylight sensors, efficient HVAC, reduced lighting power and fixtures that reduce water use.

To see a full list of Bloomberg's completed and scheduled LEED Certified Projects visit http://www.usgbc.org/projects?keys=bloomberg

RAINFOREST ALLIANCE STANDARDS SETTER

Bloomberg was recognized as the Sustainable Standard Setter at their annual gala event in NYC. The awards honor businesses and individuals that champion conservation, protect the environment and support local communities. Bloomberg is the only publisher with 100% of their publications printed on FSC-Certified paper.

WINDMADE LABEL

We became the first news organization in the world to receive the WindMade label, a global consumer designation for companies that use wind energy and other renewable sources. Bloomberg's U.S. operations achieved WindMade certification by offsetting 58% of its power consumption with wind-based RECs, and a further 25% with biomass.

CORPORATE REGISTER REPORTING AWARDS

Bloomberg was recognized in 2012 for its Sustainability Report by the Corporate Register in the "Best 1st Time Report" category.
BLP CARBON EMISSIONS CALCULATION PROCESS

Version 7.0
Revision History

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1. Introduction

1.1 Purpose

The purpose of this document is to detail the processes Bloomberg LP (BLP) has utilized, and will continue to utilize, to calculate Carbon Emissions resulting from its operational activities. Carbon Emissions will be calculated for specific time periods based on calendar year (BLP’s fiscal year matches calendar year).

1.2 Project Members & Stakeholders

<table>
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<tr>
<th>Name</th>
<th>Department</th>
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<tr>
<td>Peter Grauer</td>
<td>Chairman</td>
</tr>
<tr>
<td>Dan Doctoroff</td>
<td>President &amp; CEO</td>
</tr>
<tr>
<td>Kate Schroeder</td>
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<tr>
<td>Angela Sun</td>
<td>President/CEO’s Office – Chief of Staff</td>
</tr>
<tr>
<td>Beth Mazzeo</td>
<td>COO</td>
</tr>
<tr>
<td>Cas Holloway</td>
<td>Deputy COO</td>
</tr>
<tr>
<td>Lynn Cole</td>
<td>Deputy COO Team</td>
</tr>
<tr>
<td>Curtis Ravenel</td>
<td>Global Head - Sustainability</td>
</tr>
<tr>
<td>Lee Ballin</td>
<td>Sustainability – Supply Chain/Waste Reduction</td>
</tr>
<tr>
<td>Michael Barry</td>
<td>Sustainability – Facilities &amp; Technology</td>
</tr>
<tr>
<td>Dylan Herman</td>
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<tr>
<td>Justine Li</td>
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<tr>
<td>Andrew Park</td>
<td>Sustainability – Strategy, Philanthropy, Special Proj.</td>
</tr>
<tr>
<td>Jason Shulman</td>
<td>Sustainability – Reporting &amp; Analysis</td>
</tr>
<tr>
<td>Lenora Suki</td>
<td>Sustainability – ESG Product Strategy</td>
</tr>
<tr>
<td>Steven Haber</td>
<td>Legal</td>
</tr>
<tr>
<td>Andrew Korin</td>
<td>Sales</td>
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<tr>
<td>David Tamburelli</td>
<td>Product - Equity &amp; Portfolio Analytics</td>
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<td>Gary Turkel</td>
<td>Application Specialists</td>
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<td>Josh Steiner</td>
<td>Industry Verticals</td>
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<tr>
<td>Jo Ryan</td>
<td>CRCO Client Engagement</td>
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<tr>
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<tr>
<td>-----------------</td>
<td>-------------------------------------</td>
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<tr>
<td>Jack Davis</td>
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<td>Ken Cooper</td>
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<td>Lauren Smith</td>
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<td>John O’Connor</td>
<td>R&amp;D Data Center</td>
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<tr>
<td>Anne Erni</td>
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<tr>
<td>Elana Weinstein</td>
<td>Diversity &amp; Inclusion</td>
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<tr>
<td>Erin Barnes</td>
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<tr>
<td>Kevin Sheekey</td>
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<tr>
<td>Nanette Smith</td>
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<td>Margaret Trapp</td>
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<td>Maureen McGuire</td>
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### 1.3 Process Owner

The owner of this process is the Sustainability team member responsible for Reporting and Analysis (Sustainability Analyst). He/she will be responsible for the content of this document, and all updates/future versions.
2. Overview and Methodology

Bloomberg LP (BLP) has calculated, and will continue to calculate, its Carbon Emissions (including its 2007 “Baseline” emissions) with guidance from many different sources, but most prominently the WRI (World Resources Institute) and WBCSD (World Business Council on Sustainable Development) in the form of the WRI Report “Hot Climate, Cool Commerce: A Service Sector Guide to Greenhouse Gas Management” (May, 2006). Bloomberg also utilized information available from The Greenhouse Gas Protocol Initiative website (www.ghgprotocol.org) and other websites/documents, specifically Carbon Emissions Factors. Each reference is noted with source, version and date (where applicable). Pursuant to this guidance, BLP followed, and continues to follow, this framework for calculating our Carbon Emissions:

- **Established Organizational/Operational Boundaries (Relevance):** Bloomberg utilizes an Operational Control boundary for the purposes of all emissions-related reporting. Regarding these Operational boundaries (i.e. what operational components are being captured/what gases are being measured in our inventory):
  - For 2007 Baseline through current, BLP was and is focused on measuring CO2e emissions (including CO2, CH4 and N2O) for all Scope I and Scope II activities.
  - In addition to Scope I and II emissions, BLP calculates emissions for specific Scope III segments (Business Travel, Supply Chain shipping, Paper Consumption, Landfill Waste). The BLP Sustainability Group identified the components within these boundaries in consultation with a representative from The Climate Group (www.theclimategroup.org). BLP calculates CO2e for Paper, Waste, Supply Chain logistics and Business Travel.

- **Identified Emission Sources (Completeness):** The established Operational boundaries pertain to all facilities and operations that were/are active during a specified time period. BLP believes it has identified all Scope 1 and Scope 2 sources of CO2e emissions, as well as selected Scope 3 emissions, within the prescribed boundaries and therefore believe all pertinent emissions generated by BLP operations are being fully captured.

- **Documented Data Collection Process (Consistency):** BLP documented sources of all data used to calculate CO2e emissions, including identifying specific CO2e conversion factors to be used, so data collection for future time periods is consistent with baseline (2007) data collection, and results are comparable.

**NOTE:** As baseline 2007 Carbon Emissions have been established and subsequent years’ Emissions are calculated, against which future results will be measured, there are certain circumstances (detailed below) under which BLP would re-state its 2007 baseline or subsequent year’s results. BLP would consider re-statement if the impact of the adjustment amounted to 0.5% of that year’s Carbon Emissions.

- **Acquisition:** When BLP acquires additional operations, it incorporates and reports the emissions impact of these acquisitions as soon as possible. Potentially an acquisition made late in a calendar year may not be available to include in BLP emissions until the end of the following calendar year, at which point it may be necessary to re-state emissions from the year of acquisition (See NOTE 2).

**NOTE 1:** Bloomberg executed two acquisitions in December 2009, Businessweek and NEF. Bloomberg included the emissions impact of those operations for 2009 (for the portion of the year they were part of Bloomberg) and for 2010 (full-year). Bloomberg has determined a full-year emissions impact of those acquired operations at the time of acquisition and applied them to prior years’ emissions totals for the purpose of effective comparison.
NOTE 2: Bloomberg acquired the Bureau of National Affairs (BNA) in September 2011, but was unable to gather sufficient data to quantify BNA's CO2e impact on Bloomberg's 2011 emissions. BNA's emissions-related data was accumulated in 2012 and BNA's impact on both 2011 and 2012 Bloomberg emissions was reported at year-end 2012.

NOTE 3: Bloomberg acquired Polarlake in May 2012. 2012 May-December Polarlake emissions were reported in BLP's 2012 emissions.

When evaluating year-over-year results, it may be necessary in some scenarios to revise our 2007 Baseline year emissions to incorporate the impact of acquisitions on baseline emissions. In those scenarios, BLP will be explicit about assumptions made and calculations performed.

**Divestiture:** When BLP divests operations, it removes the emissions impact of these divested operations in the first calendar year in which the divested operation is not part of Bloomberg. When evaluating year-over-year results, it may be necessary in some scenarios to revise our 2007 Baseline year emissions to adjust for the removal of the divested operations. In those scenarios, BLP will be explicit about assumptions made and calculations performed.

- **Clarification:** If some component of BLP’s 2007 baseline (or subsequent year’s emissions) is calculated using estimation and/or extrapolation (in the absence of specific data), and subsequently accurate data for that time period were to become available (eliminating the need for estimation/extrapolation), BLP would recalculate results for that and subsequent time periods for that component of carbon emissions using the actual data.

- **Additional Emission Source:** If at some point we elect to include in our Carbon Emissions calculation an emission source not included in our baseline and/or subsequent years’ results, we will either calculate the CO2e emissions for the baseline time period for that emissions source or, lacking data from which to calculate emissions for that period, make an estimate of those emissions for the baseline and/or subsequent time periods.

- **CO2/CH4/N2O Factor Revision:** If factors become available that are applicable to prior years (i.e. factors become available in 2013 that were applicable to 2010), then we would utilize those revised factors to re-calculate for all impacted years.

- **Error/Omission:** If it was found that in a specific year an error occurred in calculation of emissions, or that there was an omission of relevant data, we would correct that error/omission and recalculate emissions for that year.

**Created Data Transparency (Transparency):** Documentation includes sources of all data and conversion factors used, methods of acquiring such, and identification of any and all assumptions/extrapolations made in the process of calculating CO2e Emissions.

**Utilized Data Validation Process (Accuracy):** BLP engages in detailed analysis in an effort to ensure the accuracy of our sourced data used to calculate carbon emissions. This analysis includes additional data “checks and balances” (i.e. use of meter/account numbers to confirm completeness of power usage data), use of metrics to compare year-over-year results (i.e. year-to-year consistency and “reasonableness”), etc. Any analyses used in this manner are specified in the individual segment’s flow chart below.

As stated above, we used this framework to create BLP’s 2007 Baseline and subsequent years’ CO2e Emissions and it is consistent with the framework we will utilize to calculate emissions for future time periods. Specific processes for calculating each component of BLP’s Carbon Emissions are included in the appendices of this document.
2.1 Use of Conversion Factors to Measure Emissions

BLP uses CO2/CH4/N2O conversion factors from multiple sources (sources and, when applicable, version/date of all factors used are referenced in the Appendices), and applies these factors to our key “Usage Measurements” (e.g. Kwh, Gallons consumed, miles traveled, etc.) for all operational activities included in our Carbon Emissions calculation.

2.2 Data Collection

For all relevant BLP operational activities, we attempt to collect source data for the key Usage Measurements, to which we could directly apply the appropriate CO2e factors we identified for each activity. For each activity, the degree to which we are able to obtain this source data will fall into one of four categories:

- **Direct Complete**: Source data includes all Usage Measurement data, for the full time period specified, needed to directly calculate emissions (Kwh used, gallons consumed, Miles traveled, etc.).

- **Direct Partial**: Source data includes Usage Measurement data needed to directly calculate emissions (Kwh used, gallons consumed, Miles traveled, etc.), but only for part of the time period specified. Extrapolation/Estimation, time-based or otherwise (e.g. spending patterns), is required to determine emissions for the full specified time period.

- **Indirect**: Source data includes data from which we can estimate/calculate Usage Measurements, from which we can then calculate emissions. We will document the process utilized to extrapolate/estimate Usage Measurements for the specified time period based on relevant data points from the source data (e.g., with origin and destination information for Car Service trips, can utilize Google Maps to determine approximate miles driven).

- **Absent**: No source data readily available. We must use similar/related data to estimate Usage Measurements, from which we can then calculate emissions. Utilize comparable (e.g. same activity in different time period, spending patterns) or related (estimate activity based on a related activity – e.g. number of taxi rides based on number of flight segments) data to develop a conservative estimate of Usage Measurements for specified time period.

2.3 Operational Segments of BLP Carbon Emissions

BLP's Carbon Emissions are comprised of the following operational Segments:

- **Facilities**: Includes all BLP facilities that are “Active” (active lease at facility or owned building) at any time during a specified time period. Facilities will include Office/News sites, Node sites, and Data Centers. Current emissions components from facilities are:
  - Purchased Electricity
  - Gas Consumption
  - Oil Consumption
  - Steam Generation/Consumption
- Building Common-Area Electricity (Primarily Heating, Ventilation, Air Conditioning (HVAC))
- Hydrofluorocarbons (HFCs)

- **Business Travel:** Currently includes the modes of business travel listed below. As additional modes of transport are utilized, they will be included.
  - Air Travel (Private Aircraft)
  - Air Travel (Commercial Aircraft)
  - Rail Travel
  - Car Rental
  - Car Service
  - Taxi
  - Field Service Technicians Car Usage

- **Supply Chain/Vendors:** Includes shipments of goods related to BLP’s Supply Chain, internal (between BLP facilities) and external (to/from vendors/customers), that is controlled (and therefore tracked) by BLP. Also includes distribution of Markets and Businessweek magazines, and BBNA truck fleet.

- **Paper Consumption:** Includes Office Paper (paper supplies used by Bloomberg Offices and BLP INK), BLP Press (through the end of 2009) and paper consumption associated with creating Markets and Businessweek magazines.

- **Landfill Waste:** Global BLP waste that is not recycled, composted or sent to waste-to-energy.

Detailed information related to emissions calculation for each of these segments is included in the appendices. Going forward, these segments will be revised as necessary, as circumstances change, or BLP elects to include other Scope 3 components that are currently not included (e.g. employee commuting, business travel hotel usage, etc.).

### 2.4 Generic Process for Calculating CO2e Emissions

For each segment of BLP’s operations, as it pertains to CO2e Emissions (see section 2.3), there is a “Business Owner” who is responsible for the data collection in that segment (see appendices for lists of Business Owners). The Business Owner may collect the data himself/herself or designate the task of actually collecting the data to another member of his/her department. The Sustainability Analyst will work closely with the Business Owners though all steps of this process.

#### 2.4.1 Identify and Acquire Source Data

The Sustainability Analyst and respective Business Owner collectively identify the Usage Measure for each CO2e-emitting activity within established boundaries, for the specified time period, and identify the most complete and reliable source for acquiring the Usage Measure data or data necessary to calculate the Usage Measure. Business Owner (or designee) acquires the “Primary Source” data from that source and documents the source and method by which it was acquired.
2.4.2 Make Necessary Extrapolations/Estimations/Calculations to Have Usage Measure Data for Full Specified Time Period

If the Primary Source data for the activity does not include Usage Measure data for the full specified time period, Business Owner and Sustainability Analyst collectively determine the appropriate and necessary action to “fill out” the data set. The four categories of data completeness (defined in 2.2) are listed below, with possible options for filling-out an incomplete Primary Source data set:

- **Direct Complete**: No adjustments required prior to calculating emissions.
- **Direct Partial**: Utilize extrapolation/estimation, time-based (i.e. if we have Usage Measure data for half a year, multiply results by 2 to get the equivalent of a full year) or otherwise (e.g. map usage to spending patterns), to determine Usage Measure data for the full specified time period.
- **Indirect**: Decide on the best available method by which we can estimate/calculate Usage Measurements from the existing data (e.g., with origin and destination information for Car Service trips, can utilize Google Maps to determine approximate miles driven OR estimate miles per trip based on previous years' data).
- **Absent**: With no source data readily available, options are to utilize data from comparable/related activities to develop a conservative estimate of Usage Measurements for specified time period. Some examples of utilizing comparable/related data:
  - Identify same activity in different time period.
  - Identify same activity in a similar location (e.g. A facility has no data for HVAC activity, we identify a similar facility – by use/geography – that does have HVAC data, identify a per-square-foot activity utilization rate, and apply it to the facility w/ no data).
  - Identify a related activity from which we can estimate usage (e.g. number of taxi rides based on number of flight segments).

The completion of incomplete data sets will be addressed on a case-by-case basis. It is ultimately the Sustainability Analyst’s responsibility to confirm an incomplete data set is filled out in an acceptable manner, and also to document the process used for each instance in which this action is required.

2.4.3 Identify Appropriate CO2e Emissions Factors for Each Emissions-Generating Activity

The Sustainability Team, with assistance from a consultant from Cventure LLC, has identified what we feel are the most applicable CO2e emissions factors for each operational segment/usage measure. Sustainability Analyst documents the source and version/date (where applicable) of every CO2e emissions factor used in calculating our carbon emissions so we can use factors from consistent sources over time.

2.4.4 Calculate CO2e Emissions

Sustainability Analyst, for each emissions-generating activity, takes the Usage Measure data, identifies and documents assumptions required to calculate CO2e emissions (e.g. car type utilized for Car Rentals/Car Service/Taxi, distance thresholds to determine short/medium/long flights, etc.), and applies the appropriate CO2e emissions factors to calculate the CO2e emissions for the specified time period.
2.4.5 Source File Management/Retention

Sustainability Analyst is responsible for filing and retaining all files/documents related to BLP’s Carbon Footprint on BLP network to insure all files are protected by network back-up. These files include, but are not limited to:

• Source/Validation Data
• Calculation Spreadsheets
• Department Documentation
• Reference Files
3. APPENDICES

3.1 Appendix 1 - 2013 BLP Carbon Emissions

2013 CARBON EMISSIONS TALLY

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<td>Non-Electric:</td>
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<td>Gas</td>
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<td>Steam</td>
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<td>HFC (Actual)</td>
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<td>TOTAL FACILITIES:</td>
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TRAVEL

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PAPER/WASTE

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TOTAL 2013 BLOOMBERG CARBON EMISSIONS: 189,267.68

BY SCOPE:

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### 3.2 Appendix 2 – Facilities

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<td>Direct Complete for owned facilities.</td>
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- **Usage Data**
  - **Purchased Electricity**: Direct, Complete by Owner.
  - **Oil Consumption**: Direct, Complete by Owner.
  - **Natural Gas Consumption**: Direct, Complete by Owner.
  - **Steam (to Kwh) Consumption**: Direct, Complete by Owner.
  - **HVAC/ Common Area KWh**: Direct, Complete for 731 Lexington. Landlord-provided for select others, Estimated for the rest.
  - **HFC**: Direct, Complete for owned facilities.
### 3.2.2 Facilities CO2e Factors

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## GLOBAL FACILITIES - PURCHASED KWH (Cont)

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<td>Vietnam</td>
<td>429</td>
<td>0.0109</td>
<td>0.0083</td>
<td>IEA: “CO2 Emissions from Fuel Combustion 2013” (2011 Factors)</td>
</tr>
</tbody>
</table>

## NON-ELECTRIC POWER

<table>
<thead>
<tr>
<th>Source</th>
<th>Usage Measure</th>
<th>CO2 Grams/MMBTU</th>
<th>CH4 Grams/MMBTU</th>
<th>N2O Grams/MMBTU</th>
<th>Assumptions</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steam</td>
<td>MMBTU</td>
<td>57,717.40</td>
<td>N/A</td>
<td>N/A</td>
<td>92% Efficiency, 700 degrees F Steam Temp</td>
<td>API Compendium</td>
</tr>
<tr>
<td>Oil</td>
<td>MMBTU</td>
<td>73,098.01</td>
<td>10</td>
<td>0.6</td>
<td>Distillate Fuel Oil, 5.825 MMBtu/barrel</td>
<td>&quot;Climate Leaders GHG Inventory Protocol: Direct Emissions from Stationary Combustion&quot;, U.S. EPA, EPA430-K-08-003, May 2008</td>
</tr>
</tbody>
</table>
### 3.2.3 Flow Chart – Facilities Data Capture

For each facility, can NUS (a) provide utility info (b)?
- **YES**
  - Frequency of report: Quarterly or as requested
  - Sustainability Analyst (SA) receives NUS report from NUS Rep indicating costs and consumptions of all applicable utilities for the facilities NUS handles.
  - SA stores the NUS report in the Facilities/NUS Source Documents file for the appropriate Audit Year.
  - Spot-Check: 1 invoice in each 6-month period
- **NO**
  - For each facility, is utility info available in SAP?
    - **YES**
      - SA (or designee) reviews utility invoices in SAP, identifies applicable consumption quantity and documents the SAP Doc # for appropriate Facility/Audit Year.
      - - Sustainability Analyst provides Accounts Payable with list of all facilities for which NUS did not have data but utility invoices were present in SAP so AP can determine if those facilities should be handled by NUS.
    - **NO**
      - For each facility, is utility information available from the Landlord?
        - **YES**
          - SA provides Regional Facilities Mgrs and Global Leasing Mgr with list of facilities for which BLP needs utility info from Landlord, and what utilities are needed.
          - Facilities Mgrs/Global Leasing provides SA with utility information provided by Landlord.
        - **NO**
          - SA formulates “Regional Utility Defaults” per soft by facility type.
- For each facility for which we have no basic Kwh and/or no building common-area Kwh consumption information, SA applies the Regional Utility Defaults (d) in the Master Template (e).

**SA notes on Template which facilities’ entries utilize Regional Utility defaults**

- **YES**
  - SA enters applicable consumption quantities on the appropriate Master Template (Electric or Non-Electric).
  - Once all utility data for all facilities is entered into Master Templates, templates will calculate the CO2 Emissions related to BLP’s facilities energy consumption.
  - For any facility for which we are unable to reconcile NUS provided data, we will follow the process of pulling facility data from SAP.
  - Spot-Check: SA reviews all utility invoices in SAP for time period against NUS data, and then with the NUS representative

**END**  

**Anomaly: SA reviews data with FSM of facility in question to determine if deviation is valid**

**Spot-Check: SA reviews all utility invoices in SAP for time period against NUS data, and then with the NUS representative**

**Do the NUS-Captured quantities pass the review and spot-check?**

**YES**  

**Able to reconcile and correct data?**

**NO**

**NOTES:**

(a) NUS is a consulting firm that maintains a portion of BLP facilities utility data. Their process is:
  i) NUS receives BLP’s Utility invoices, either from BLP or direct from the Utility vendor.
  ii) NUS manually enters pertinent information from the invoice into the NUS database, including vendor, utility (Electricity, Water, Natural Gas, Oil, Steam), unit of measure (Kwh, gallons, therms, gallons, mbts (thousand lbs)) and consumption quantities (w/ other data points not related to Carbon Footprint).
  iii) Nus stores data in their database and supplies SA with reports ("data dumps") containing detailed utility consumption data for numerous BLP Facilities (not all).

(b) Facility Utility information includes Electricity Kwh, Common/HVAC Kwh, Gallons of Water, Therms of Natural Gas, Natural Gas, Oil, mbts (thousand-lbs) of Steam.

(c) Regional Facilities Mgrs can provide direct Kwh consumption from the landlord (typically tracked throughout the year) while Global Leasing requests both direct and common-area consumption from the landlord. Our target is to collect 90% actual direct consumption data in each region, measured by square footage. Facilities below that 90% cutoff are small and usually immaterial.

(d) Regional Utility Defaults are per-square-foot assumptions of Kwh consumption that are calculated by dividing total consumption of each utility type (basic Kwh, common-area Kwh, etc.) by square footage for each facility in a region (for which we have this info) and then averaging all those of each facility type to produce a regional average for each facility type for each region, which are called the “Regional Utility Defaults”.

(e) Sustainability Analyst creates a Master Template for both Electric and Non-Electric consumption into which SA (or designee) will enter all pertinent utility information for each facility in BLP’s portfolio. The templates will contain all necessary and applicable CO2 Emissions calculation factors (see 3.2.2) with which we will calculate CO2 emissions related to BLP’s energy consumption.

(f) Information on Node Sites that operate without a lease (i.e. under a “Service Agreement”) is provided by Networks Dept. and is stored in the facilities folder, in a separate file from leased facilities.
### 3.3 Appendix 3 – Business Travel

#### 3.3.1 Data Detail

<table>
<thead>
<tr>
<th>Mode</th>
<th>Scope</th>
<th>Activity Report Requirements</th>
<th>Data Source</th>
<th>Data Completeness</th>
<th>Business Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial Air (BLP)</td>
<td>3</td>
<td>Per trip, date of trip, origin/destination, airport codes, segment mileage, traveler</td>
<td>Travel Agency (BCD) Report</td>
<td>Direct Complete</td>
<td>L. Campbell</td>
</tr>
<tr>
<td>Commercial Air (BBNA)</td>
<td>3</td>
<td>Per trip, date of trip, origin/destination, airport codes, segment mileage, traveler</td>
<td>American Express Report</td>
<td>Direct Complete (Understanding future Travel Agent reports will be more accurate than Amex reports)</td>
<td>J. Lockhart</td>
</tr>
<tr>
<td>Private Aircraft</td>
<td>1</td>
<td>Per equipment, hours of use (both flying and APU), gallons of fuel purchased for business flight</td>
<td>Flight Logs/Fuel Purchase Receipts/Equipment Specifications</td>
<td>Direct Complete</td>
<td>T. Economou</td>
</tr>
<tr>
<td>US Rail (Amtrak)</td>
<td>3</td>
<td>Per trip, date of trip, origin/destination, rail station codes, segment mileage, traveler</td>
<td>Travel Agent (BCD) Report</td>
<td>Direct Complete</td>
<td>L. Campbell</td>
</tr>
<tr>
<td>UK Rail (Eurostar et.al.)</td>
<td>3</td>
<td>Per trip, date of trip, origin/destination, rail station codes, segment mileage, traveler</td>
<td>Travel Agent (BCD) Report</td>
<td>Indirect</td>
<td>L. Campbell</td>
</tr>
<tr>
<td>Rental Car (Avis)</td>
<td>3</td>
<td>Per rental, date of rental, renter, rental location, total mileage driven</td>
<td>Vendor Report/Travel Agent (BCD) Report</td>
<td>Direct Complete</td>
<td>L. Campbell</td>
</tr>
<tr>
<td>Rental Car (Hertz)</td>
<td>3</td>
<td>Per rental, date of rental, renter, rental location, total mileage driven</td>
<td>Vendor Report/Travel Agent (BCD) Report</td>
<td>Direct Complete</td>
<td>L. Campbell</td>
</tr>
<tr>
<td>UK Car Service (Various)</td>
<td>3</td>
<td>Per trip, date of trip, origin/destination, segment mileage, passenger</td>
<td>Distribution Partner Report</td>
<td>Direct Complete</td>
<td>L. Campbell</td>
</tr>
<tr>
<td>US Car Service (UTOG)</td>
<td>3</td>
<td>Per trip, date of trip, origin/destination, segment mileage, passenger</td>
<td>Vendor Report</td>
<td>Indirect</td>
<td>L. Campbell</td>
</tr>
<tr>
<td>US Car Service (Concorde)</td>
<td>3</td>
<td>Per trip, date of trip, origin/destination, segment mileage, passenger</td>
<td>Vendor Report</td>
<td>Indirect</td>
<td>L. Campbell</td>
</tr>
<tr>
<td>US Car Service (Other)</td>
<td>3</td>
<td>Per trip, date of trip, origin/destination, segment mileage, passenger</td>
<td>Vendor Report</td>
<td>Direct Complete</td>
<td>L. Campbell</td>
</tr>
<tr>
<td>Taxi</td>
<td>3</td>
<td>Number of trips, mileage assumption,</td>
<td>Estimate</td>
<td>N/A</td>
<td>J. Shulman</td>
</tr>
<tr>
<td>Field Service Technician</td>
<td>3</td>
<td>Per employee/vendor, employee/vendor name, miles driven</td>
<td>Field Service Mileage Reports</td>
<td>Direct Complete</td>
<td>V. Souravlis (US), Ivor Orr (EMEA)</td>
</tr>
<tr>
<td>Car Travel</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### 3.3.2 Travel CO2e Factors

#### BUSINESS TRAVEL

<table>
<thead>
<tr>
<th>Mode</th>
<th>Usage Measure</th>
<th>Add'l Description</th>
<th>$CO_2$ (Kg) per Mile</th>
<th>CH4 (Kg) per Mile</th>
<th>N2O (Kg) per Mile</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial Air</td>
<td>Passenger-Miles</td>
<td>Short (&lt;500km) – Economy Class</td>
<td>0.26575</td>
<td>0.0000077</td>
<td>0.0000085</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Medium (&gt;500km, &lt;700Km) – Economy</td>
<td>0.14460</td>
<td>0.0000008</td>
<td>0.00000046</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Medium (&gt;500km, &lt;700Km) – Economy+</td>
<td>0.14460</td>
<td>0.0000008</td>
<td>0.00000046</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Medium (&gt;500km, &lt;700Km) – Bus/First</td>
<td>0.21691</td>
<td>0.0000008</td>
<td>0.00000069</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Long (&gt;3700km) – Economy</td>
<td>0.12675</td>
<td>0.0000000</td>
<td>0.0000040</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Long (&gt;3700km) – Economy+</td>
<td>0.20279</td>
<td>0.0000008</td>
<td>0.0000064</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Long (&gt;3700km) – Business</td>
<td>0.36757</td>
<td>0.0000008</td>
<td>0.0000117</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Long (&gt;3700km) – First</td>
<td>0.50701</td>
<td>0.0000015</td>
<td>0.0000161</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td>US Rail (Amtrak)*</td>
<td>Passenger-Miles</td>
<td>We utilize National Rail CO2e factors from the UK to calculate US Rail emissions</td>
<td>0.08853</td>
<td>0.0000038</td>
<td>0.0000162</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td>UK National Rail</td>
<td>Passenger-Miles</td>
<td>All international rail vendors except Eurostar</td>
<td>0.08853</td>
<td>0.0000038</td>
<td>0.0000162</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td>UK Int’l Rail</td>
<td>Passenger-Miles</td>
<td>Eurostar only</td>
<td>0.02417</td>
<td>0.0000008</td>
<td>0.0000005</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td>Car Travel -</td>
<td>Miles Driven</td>
<td>Large Petrol-Powered Engine (&gt;2.0L)</td>
<td>0.47820</td>
<td>0.0000114</td>
<td>0.0000034</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td>Includes: Car Rental</td>
<td>Miles Driven</td>
<td>Med. Petrol-Powered Engine (1.4L - 2.0L)</td>
<td>0.33289</td>
<td>0.0000114</td>
<td>0.0000034</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td>Car Taxi Service</td>
<td>Miles Driven</td>
<td>Small Petrol-Powered Engine (&lt;1.4L)</td>
<td>0.26461</td>
<td>0.0000114</td>
<td>0.0000034</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td>Field Svc Car Use</td>
<td>Miles Driven</td>
<td>Large Diesel-Powered Engine (&gt;2.0L)</td>
<td>0.37628</td>
<td>0.0000038</td>
<td>0.0000092</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td>Miles Driven</td>
<td>Med. Diesel-Powered Engine (1.4L - 2.0L)</td>
<td>0.28281</td>
<td>0.0000038</td>
<td>0.0000092</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td>Miles Driven</td>
<td>Small Diesel-Powered Engine (&lt;1.4L)</td>
<td>0.22716</td>
<td>0.0000038</td>
<td>0.0000092</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td>Miles Driven</td>
<td>Large Hybrid (Petrol/Electric)</td>
<td>0.33140</td>
<td>0.0000081</td>
<td>0.0000034</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td>Miles Driven</td>
<td>Medium Hybrid (Petrol/Electric)</td>
<td>0.18638</td>
<td>0.0000067</td>
<td>0.0000034</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mode</th>
<th>Usage Measure</th>
<th>Add'l Description</th>
<th>$CO_2$ (Kg) per Gallon</th>
<th>CH4 (Kg) per Gallon</th>
<th>CO2 (Kg) per Gallon</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private Aircraft</td>
<td>Gallons Fuel Consumed</td>
<td></td>
<td>9.7145</td>
<td>0.0002381</td>
<td>0.000309</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
</tbody>
</table>
3.3.3 Flow Chart – Business Travel Data Capture

- Activity Report: List of all activity for a specific travel vendor or mode of transport.
- For Activity Report Requirements & Business Owners: See 3.3.1 – Data Details.

For each Activity Report, SA creates a template that incorporates all applicable assumptions and CO2 factors necessary for CO2 emission calculation.

- Templates located in Assurance Audit Folder, Travel Data Folder for applicable year(s).

When Activity Reports are received, SA stores them in Travel Source Documents file for the applicable Audit Year.

For each Activity Report, SA creates a list of assumptions to apply, based on the activity data contained in the report.

BO either requests Activity Report from various sources or provides it from available data.

- Activity Report: List of all activity for a specific travel vendor or mode of transport.
- For Activity Report Requirements & Business Owners: See 3.3.1 – Data Details.

For each mode of transport, SA and TR determine who is the BLP Business Owner (BO) and notify them of Activity Report requirements.

Travel Representative (TR) and Sustainability Analyst (SA) identify all modes of transport used as part of BLP business travel.

For each Activity Report:

SQA reviews each Activity Report to determine if raw data needs to be adjusted prior to plugging in the template (b). If it does, SA creates a second version of the Activity Report, makes necessary adjustments, and stores the Adjusted Activity Report in the Travel Source Documents file for the applicable Audit Year.

SA either requests Activity Report from various sources or provides it from available data.

For each Activity Report, SA creates a list of assumptions to apply, based on the activity data contained in the report.

For each Activity Report:

(a) For 2010 and future years, Commercial Air Travel template was created in Business Warehouse (BW) database of SAP. Applicable factors also reside in BW so CO2e associated with Commercial Air Travel is calculated within BW.
(b) For example: some Car Services activity reports contain origin & destination, but no mileage info. We would assign an “Origin Borough” and a “Destination Borough” and then use the borough pairs to estimate trip mileage. These details are included on the individual templates. In the absence of usable Origin/Destination data (as in 2011), we will estimate per-ride mileage based on prior years’ average ride distance, by vendor.
(c) Usage Measure is the specific statistic to which we apply the CO2 Emissions factor to calculate the CO2 emitted for each mode of transport.
(d) i.e. If time interval is 12 months and vendor activity report covers 5 months, 5/12 * 75% = then divide calculated CO2 emissions by 75% to get extrapolated, full-year CO2e emissions.
(e) For example: For Taxi, since we have no systematized information about taxi usage, we rate Taxi usage to specific portions of air and rail travel. Those specific assumptions are listed on the calculation template for Taxi.
3.4 Appendix 4 – Supply Chain

3.4.1 Data Detail

<table>
<thead>
<tr>
<th>SUPPLY CHAIN</th>
<th>Scope</th>
<th>Activity Report Requirements</th>
<th>Data Source</th>
<th>Data Completeness</th>
<th>Business Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asset Mgmt. Freight Shipments</td>
<td>3</td>
<td>For each line item shipped: Unit of Weight (Kg, Lbs), Gross Weight, Origin, Destination, longitude/latitude of Origin/ Destination, Shipping Distance (in miles), Route Description (Carrier).</td>
<td>SAP/Google Maps</td>
<td>Indirect</td>
<td>A. Tappan</td>
</tr>
<tr>
<td>BLP INK</td>
<td>3</td>
<td>Monthly report of packages sent, divided by Air vs. Ground, with average package weight and distance.</td>
<td>BLP INK</td>
<td>Direct Complete</td>
<td>J. Cruser</td>
</tr>
<tr>
<td>BBNA Distribution</td>
<td>3</td>
<td>Gallons of diesel fuel used in owned truck fleet</td>
<td>BBNA</td>
<td>Direct Complete</td>
<td>J. Emerson</td>
</tr>
<tr>
<td>Markets (magazine) Distribution</td>
<td>3</td>
<td>Monthly reports detailing domestic distribution of the magazine, monthly circulation data</td>
<td>RR Donnelly</td>
<td>Indirect</td>
<td>J. Lauricella</td>
</tr>
<tr>
<td>Businessweek Distribution</td>
<td>3</td>
<td>Monthly reports detailing domestic distribution of the magazine, monthly circulation data</td>
<td>Businessweek Weekly Print Reports</td>
<td>Indirect</td>
<td>B. Schraml</td>
</tr>
</tbody>
</table>

3.4.2 Supply Chain CO2e Factors

<table>
<thead>
<tr>
<th>Source</th>
<th>Usage Measure</th>
<th>Addl' Description</th>
<th>CO2 (Kg) per Mile</th>
<th>CH4 (Kg) per Mile</th>
<th>N2O (Kg) per Mile</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Freight Shipments</td>
<td>Km-Tonnes</td>
<td>Road Shipments (All Rigid, UK Avg.)</td>
<td>0.24595</td>
<td>0.00000429</td>
<td>0.00000819</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Air Freight - Short (&lt;500km)</td>
<td>2.04350</td>
<td>0.00006000</td>
<td>0.00006490</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Air Freight - Medium (500km - 3700km)</td>
<td>1.22924</td>
<td>0.00000333</td>
<td>0.00003903</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Air Freight - Long (&gt;3700km)</td>
<td>0.63470</td>
<td>0.00000190</td>
<td>0.00002016</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rail Freight (Diesel)</td>
<td>0.02760</td>
<td>0.00000000</td>
<td>0.00000035</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Marine Freight (General Cargo 0-4999 dwt)</td>
<td>0.01390</td>
<td>0.00000000</td>
<td>0.00000035</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mode</th>
<th>Usage Measure</th>
<th>Addl' Description</th>
<th>CO2 (Kg) per Gallon</th>
<th>CH4 (Kg) per Gallon</th>
<th>CO2 (Kg) per Gallon</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owned Ground Vehicles</td>
<td>Gallons Fuel Consumed</td>
<td>BBNA Truck Fleet</td>
<td>9.8599</td>
<td>0.0001648</td>
<td>0.0002357</td>
<td><a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a></td>
</tr>
</tbody>
</table>
3.4.3 Flow Chart – Asset Management-Supply Chain Data Capture

- BW Technician queries a “delivery” report out of SAP Business Warehouse (BW) to a separate BW database built to maintain annual delivery data.
- When BW Tech inputs the delivery data into database, he identifies those customers/locations that do not already have an assigned latitude/longitude (a) and assigns it via pre-defined script.
- For each shipping line item, shipping distance in miles is calculated by determining distance between longitude/latitude points of the origin and destination via a “calculation script”.
- Supply Chain BW Database calculates CO2 associated with all deliveries for the specified time period.
- All applicable transport factors are maintained in the Supply Chain BW Database.
- BW database has methodology installed that, for each delivery line item, numerous calculations/adjustments are made to facilitate CO2 calculation.

NOTES:
(a) Supply Chain BW Database performs the following data calculations/adjustments to facilitate CO2 calculation:
- Calculation to translate Gross Weight into Weight in MT
- Calculation to translate Distance in Miles to Distance in Km
- Creation of “Adjusted Distance” by adding 15% to Distance in Km for “consolidation”
- Application of Distance-Based & Carrier-Based assessment of transport mode.
- Application of “add-on” transport components to Air and Sea shipments.
(b) CO2 Factors are maintained in the Supply Chain BW Database by year (i.e. a separate set of factors for each year). If factors change over time, revised or new factors will be loaded and utilized for the appropriate year.

2011 NOTE: For 2011 SAP Supply Chain data, the shipping weights of certain products in the SAP system were inflated to the degree that overall shipping weight for the year was overestimated by a factor of 10. For this reason, for 2011 Asset Management Supply Chain, we calculated emissions based on 2010 per-shipment emissions for each shipping method (Air/Ground/Sea).

3.4.4 Flow Chart – BLP INK-Supply Chain Data Capture

- Monthly, BLP INK Mgr goes to Data2Logistics (D2L) portal to run a pre-formatted Monthly Shipping Summary report of outbound shipments from BLP INK.
- BLP INK Mgr uses data from Monthly Shipping Summaries to populate template for Sustainability that collects monthly data throughout the year and calculates CO2 emissions for each month’s shipments.
- BLP INK Mgr sends completed template monthly to Sustainability Analyst.
- Once all data for the year is reviewed and “accepted”, final year-end CO2 emissions calculation confirmed.
- If SA identifies something that appears anomalous, BLP INK Mgr confirms D2L data for that month in question.
- Sustainability Analyst (SA) reviews completed template for formula integrity and “reasonableness”.

END
3.4.5 Flow Chart – Markets Magazine-Supply Chain Data Capture

Sustainability Analyst (SA) received monthly “print-run” reports (for full time period) from Markets Magazine Production Director detailing number of magazines printed per month and global dispersal of magazines.

In 2009, SA calculated Markets Magazine distribution CO2 for January 2009 based on travel distance from shipping point (Brown Printing) to all destinations and mode of transport (Ground/Air) based on carrier service.

SA took monthly print-run data for 2010 and extrapolated monthly distribution CO2 based on a comparison to January 2009 print-run quantities.

NOTES:
(a) Markets Magazine switched printers at beginning of 2010 from Brown Printing to RR Donnelly. We are still working with RR Donnelly to refine reporting of the distribution network. We expect to be able to effectively report details of our magazine distribution for 2011, but for 2010 we used our original monthly CO2 calculation from January 2009 to extrapolate monthly Markets Magazine Distribution CO2 based on total Print-Run quantities.

3.4.6 Flow Chart – Businessweek Magazine-Supply Chain Data Capture

Sustainability Analyst (SA) received a detailed report from Businessweek Manufacturing/Delivery that included for 2010, for each issue:
- Number of issues in print runs/ circulation.
- Average weight per issue (whether single or double issue).

SA calculated, for each issue in 2010, total weight of the print run by multiplying issue weight (single or double issue) by total issues in the print run.

Using Markets magazine’s January 2009 distribution as a baseline (a), SA calculated CO2 emissions for Businessweek distribution, for each issue, by:
- Determining BW circulation weight as % of Markets’ January 2009 circulation weight.
- Multiplying that % by Markets’ CO2 for January 2009.

NOTES:
(a) Similar to Markets magazine, we do not have the level of detail about Businessweek’s distribution network to effectively report CO2 associated with Businessweek distribution. As with Markets, we expect to be able to report details of our magazine distribution for 2011, but for 2010 we used the same monthly CO2 calculation for Markets from January 2009, taking into account lighter issue-weight, to extrapolate per-issue Businessweek CO2 based on total Print-Run quantities.
### 3.5 Appendix 5 – Paper Consumption

#### 3.5.1 Data Detail

<table>
<thead>
<tr>
<th>Source</th>
<th>Scope</th>
<th>Activity Report Requirements</th>
<th>Data Source</th>
<th>Data Completeness</th>
<th>Business Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paper Consumption:</td>
<td>3</td>
<td>Paper types (including recycled content), quantities (in LBS) used/received,</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Markets Magazine</td>
<td></td>
<td></td>
<td>RR Donnelly</td>
<td>Direct Complete</td>
<td>P. Harris</td>
</tr>
<tr>
<td>Businessweek</td>
<td></td>
<td></td>
<td>Businessweek-Manufacturing/Delivery</td>
<td>Direct Complete</td>
<td>B. Schraml</td>
</tr>
<tr>
<td>BBNA Publishing</td>
<td></td>
<td></td>
<td>McArdle Printing</td>
<td>Direct Complete</td>
<td>J. Emerson/T. Dorsey</td>
</tr>
<tr>
<td>Other (Includes BLP INK and Office Paper)</td>
<td></td>
<td></td>
<td>Paper Vendor Reports</td>
<td>Direct Complete</td>
<td>P. Harris (US) T. Che (Asia) S. Campbell (EMEA) C. Prandini (LatAm)</td>
</tr>
</tbody>
</table>

#### 3.5.2 Paper CO2e Factors

<table>
<thead>
<tr>
<th>Source</th>
<th>Usage Measure</th>
<th>Description</th>
<th>PCW%</th>
<th>CO2e Emissions [Kg] per LB</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paper Consumption LBS Used*</td>
<td></td>
<td>Magazine (&quot;Coated Groundwood&quot;)</td>
<td>100%</td>
<td>0.8954</td>
<td><a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a></td>
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<tr>
<td></td>
<td></td>
<td>Magazine (&quot;Coated Groundwood&quot;)</td>
<td>50%</td>
<td>1.1118</td>
<td><a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Magazine (&quot;Coated Groundwood&quot;)</td>
<td>20%</td>
<td>1.2419</td>
<td><a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a></td>
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<tr>
<td></td>
<td></td>
<td>Magazine (&quot;Coated Groundwood&quot;)</td>
<td>10%</td>
<td>1.2850</td>
<td><a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a></td>
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<tr>
<td></td>
<td></td>
<td>Magazine (&quot;Coated Groundwood&quot;)</td>
<td>0%</td>
<td>1.3295</td>
<td><a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a></td>
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<tr>
<td></td>
<td></td>
<td>Copier Paper (&quot;Uncoated Freesheet&quot;)</td>
<td>100%</td>
<td>0.8011</td>
<td><a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a></td>
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<tr>
<td></td>
<td></td>
<td>Copier Paper (&quot;Uncoated Freesheet&quot;)</td>
<td>99%</td>
<td>0.8060</td>
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<tr>
<td></td>
<td></td>
<td>Copier Paper (&quot;Uncoated Freesheet&quot;)</td>
<td>80%</td>
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<td></td>
<td>Copier Paper (&quot;Uncoated Freesheet&quot;)</td>
<td>75%</td>
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<tr>
<td></td>
<td></td>
<td>Copier Paper (&quot;Uncoated Freesheet&quot;)</td>
<td>70%</td>
<td>0.9421</td>
<td><a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a></td>
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<tr>
<td></td>
<td></td>
<td>Copier Paper (&quot;Uncoated Freesheet&quot;)</td>
<td>50%</td>
<td>1.0356</td>
<td><a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Copier Paper (&quot;Uncoated Freesheet&quot;)</td>
<td>0%</td>
<td>1.2705</td>
<td><a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a></td>
</tr>
</tbody>
</table>

* "LBS Used" includes waste that occurs during the magazine printing process
3.5.3 Flow Chart – Paper Consumption Data Capture

- Paper Vendors: Central Lewmar, Lindenmery Munroe, New Leaf, RIS, Staples, Xerox, XpediX
- Purchasing Reps: Phylis Harris (US), Humberto Ferraz (LatAm), Steve Campbell (EMEA), Angela Lok (Asia)
- Usage Report rec’d: Excel via Email, or Fax
- Report Frequency: Quarterly

FOR MAGAZINES:
Sustainability Analyst (SA) acquires paper consumption report from appropriate source for Markets and Businessweek Magazines (see Data Source above). Reports detail paper usage (by type, in lbs) for each print run of Markets/Businessweek magazines.

SA reviews paper consumption reports vs. print run reports and consumption reports from previous year as a check to determine if there are any anomalies in current year’s consumption reports

SA stores/maintains these aggregated vendor reports and magazine consumption reports in the Paper Consumption Source Data files for the applicable Audit Year.

SA uses paper types/quantities provided in aggregated reports to calculate the CO2e emissions associated with BLP’s global paper consumption.

END

NOTE: PO and delivery data are reconciled at the time of delivery for each delivery.
3.6 Appendix 6 – Waste

3.6.1 Data Detail

<table>
<thead>
<tr>
<th>Waste</th>
<th>Scope</th>
<th>Activity Report Requirements</th>
<th>Data Source</th>
<th>Data Completeness</th>
<th>Business Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste</td>
<td>3</td>
<td>Per office, Tons of non-recycling/non-compost/non-waste-to-energy waste (i.e. “Landfill Waste”).</td>
<td>Waste Vendors and Landlords via Facility Site Managers (FSMs)</td>
<td>Direct Partial</td>
<td>M. Barry</td>
</tr>
</tbody>
</table>

3.6.2 Waste CO2e Factors

<table>
<thead>
<tr>
<th>Waste</th>
<th>Usage Measure</th>
<th>Add'l Description</th>
<th>CO2e Emissions (Kg) per Ton</th>
<th>Source</th>
</tr>
</thead>
</table>

3.6.3 Flow Chart – Waste Data Capture

(a) Employee counts for this process consist of full-time and part-time personnel (received from HR), as it is determined that both contribute to waste totals.
(b) SA divides number of employees in offices with vendor/landlord-reported waste numbers by number of total BLP employees to get percentage of BLP employees represented by the vendor/landlord-reported waste total.
(c) SA extrapolates global BLP waste quantities by dividing Landfill Waste totals from vendor/landlord reports by the percentage of employees represented by the vendor/landlord-reported waste total.
- For example: If we receive vendor/landlord reports indicating 100 tons of landfill waste for offices that represent 5,000 of our 10,000 global employees: 5,000/10,000 = 50%. 100 tons/50% = extrapolated global total of 200 tons.
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 party 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
• 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](http://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 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
- 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 – Bronzef 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 chrome1 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 scrubber, 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-scraps 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/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.
  - **Products carrying the FSC label are independently certified to assure consumers that they come from forests that are managed to meet the social, economic and ecological needs of present and future generations**
  - **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

![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 60oF 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/findapduct/index.cfm](http://www.greenseal.org/findapduct/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](http://www.carpet-rug.com).

**6.13.5 Non Carpeted finished Flooring**

Purchase and install FloorScore-certified flooring. [http://www.rfci.com/int_FS-ProdCert.htm](http://www.rfci.com/int_FS-ProdCert.htm)

**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:
  o 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 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 (EPA) 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 described 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/scraper 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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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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### 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).

Hand Hygiene:

BLP will develop strategies for promoting and improving hand hygiene, including both hand washing and the use of alcohol-based waterless hand sanitizers.

BLP will communicate with building occupants on the proper hand washing techniques and provide signage as a reminder to employees and other building occupants to wash hands.

BLP will identify in each market in which it operates, local suppliers who are capable of continuously supplying the appropriate hand cleaning products.

Protection of Vulnerable Building Occupants:

BLP will establish and maintain standard operating procedures to address how an effective cleaning, hard floor and carpet maintenance system will be consistently utilized, managed, and audited. This will specifically address cleaning to protect vulnerable building occupants, such as occupants with asthma, other respiratory conditions, or sensitive or damaged skin.
The methods used to minimize impacts on occupants who are likely to be disproportionately affected by cleaning practices may include but not limited to adjustments to cleaning procedures, frequencies, and/or timing.
BLOOMBERG INK FSC CHAIN OF CUSTODY

BLOOMBERG INK, A DEPARTMENT OF BLOOMBERG L.P.
431 RIDGE RD
DAYTON, NEW JERSEY 08810
UNITED STATES

IS CERTIFIED FOR FOREST STEWARDSHIP COUNCIL™ CHAIN OF CUSTODY

Certificate Scope

Certificate Type: Multi-site Chain of Custody
Standard(s): FSC-STD-40-003 V1-0; FSC-STD-40-004 V2-1
Product group(s): Notebooks, Notepads, Envelopes, Books, Advertising Materials, Calendars
Valid from October 30, 2013 to October 29, 2018
Certificate Registration Code: RA-COC-003563
FSC License Code: FSC-C020405
Certificate Issue Number: IN-2013-1

As a multi-site certificate, the activities and products included in the scope of this certificate are performed by a network of participating sites. Additional details regarding the scope, including a full list of products, species, and participating sites, are available at info.fsc.org.

Jon Jickling, Director, Certification
Rainforest Alliance
223 Broadway, 28th Floor New York, NY 10279 USA

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The validity of this certificate shall be verified on info.fsc.org. This certificate does not constitute evidence that a particular product supplied by the certificate holder is FSC certified and/or FSC Controlled Wood. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required FSC claim is clearly stated on invoices and shipping documents.

This certificate is the property of Rainforest Alliance. This certificate and all copies or reproductions of this certificate shall be returned or destroyed if requested by Rainforest Alliance.

Version July 2013
GREEN LANGUAGE IN RFP'S
Environmentally Preferable "Green" Requirements

Bloomberg LP has implemented a "Green" corporate initiative. Our mission is to help preserve and protect the environment in our business activities, as we work towards reducing our "Carbon Footprint". This includes procuring goods and services that have a lesser or reduced effect on human health and the environment when specifically compared with other goods and services that serve the same purpose. To help us achieve our goals and objectives, Bloomberg highly encourages all Companies to publicly release a Global Reporting Initiative (GRI) Compliant Sustainability Report. If your Company already releases a sustainability report, please send a web link to the report to BSUSTAINABLE@BLOOMBERG.NET for Bloomberg's review. If your company does not publish a sustainability report, Bloomberg asks vendors submitting responses to this Request for Proposal (RFP) to submit copies of their firm's "Green" initiative, detailing policies and procedures and information about what makes your goods and/or services environmentally preferable ("Green"). Information should include, but is not limited to, whether your firm is listed on the Dow Jones Sustainability Index, is accredited to any recognized Environmental Standards, has employees who are certified or has environmental educational programs for employees and if the educational programs are available to clients.

Depending on the nature of your business, Bloomberg reserves the opportunity to send a subsequent vendor survey to potential vendors should we need to clarify any concerns Bloomberg has regarding the Company's commitment to Sustainability.

Please provide "Green" contact information, so Bloomberg can direct requests for additional information, if required.

"GREEN" Contact(s): _______________________

Phone: ________________________________

Fax: ________________________________

E-mail: ______________________________

All goods and/or services procured by Bloomberg must meet and/or exceed any or all local, state or federal governing bodies. Failure to comply with Bloomberg's environmentally preferable ("Green") requirements may affect future opportunities for your firm.
GREEN LANGUAGE IN CONTRACTS
Representations, Warranties and Covenants.

We ask Service Providers to represent, warrant and covenant to Bloomberg and its affiliates that to the extent practicable, they shall seek to use products certified under the “Green Seal” certification process, or, at Bloomberg’s discretion, a comparable standard, under the most recent version of the applicable standard for all goods or products used to provide the Services and Deliverables, and in any event shall conform to all applicable requirements of law, and Service Provider shall be responsible for ensuring that such products will not adversely affect the quality or results of the Services and Deliverables.

In addition, Bloomberg reserves the right to ask Service Providers to provide information regarding their sustainability programs and initiatives and highly encourages all Service Providers to publicly release a Global Reporting Initiative (GRI) Compliant Sustainability Report. In the event that a Service Provider releases a sustainability report, it shall send a web link to the report to BSUSTAINABLE@BLOOMBERG.NET for review. Bloomberg additionally reserves the right to send a subsequent Bloomberg L.P. Vendor Environmental Performance Survey to Service Providers should Bloomberg require clarification regarding a Service Provider’s commitment to Sustainability. Upon request Service Providers shall provide to Bloomberg ongoing reports and data pertaining to environmental or other aspects of the Services which may be used by Bloomberg in its discretion to obtain certifications or achieve standards and in each case maintain them.
SCRAPPER CERTIFICATE OF COMPLIANCE

THIS CERTIFICATION is made by [INSERT COMPANY] (“Company”) as of the date of signature below. Company hereby represents, warrants and covenants to Bloomberg L.P. (“Bloomberg”) as follows:

1. Company is in compliance with all applicable local, city, state, federal and international laws, rules and regulations including, but not limited to, all antidumping, environmental, safety and health and labor and employment laws, rules and regulations, and shall remain in compliance for so long as Company is performing any services for Bloomberg.

2. Except as otherwise disclosed to Bloomberg in writing, there are no judgments, liens, demands, claims, suits, actions, arbitrations or other proceedings outstanding, pending or threatened (or for which any basis exists) that in any way questions or jeopardizes (or could question or jeopardize) the ability of Company to perform any of Company’s obligations in connection with the provision of services to Bloomberg.

3. Except as otherwise disclosed to Bloomberg in writing, there is no pending enforcement, administrative action or environmental claim or judgment against the Company, nor has the Company recently settled any such claim or judgment.

IN WITNESS WHEREOF, the Company has executed this Certification as of the date set forth below:

[INSERT NAME OF COMPANY]

By: ______________________
Name: ______________________
Title: ______________________
Date: ______________________
BLOOMBERG SUPPLIER PROTOCOL OF ETHICAL BEHAVIOR

Bloomberg prides itself on making all reasonable efforts to ensure a safe and environmentally friendly supply chain environment for all of the products that we manufacture or purchase. These efforts are not only required within Bloomberg, but are also a requirement of its suppliers and their respective supply chain(s).

Any and all practices within the Bloomberg supply chain must not only be in accordance with all local, federal and international employment law, but adhere to generally accepted humane practices. Our suppliers shall be socially conscientious and responsible with programs and practices that treat their workers and/or sub-contactors with respect and dignity. Bloomberg requires that all next tier suppliers operate in full compliance with internationally customary and accepted employment practices.

Bloomberg and its supply base shall not discriminate against anyone in regard to employment, training and working conditions on the basis of race, color, sex, religion, political opinion, nationality or social origin.

Suppliers shall not engage in harassment of any type, whether it is of a sexual, mental, physical, or verbal nature. All work must be voluntary and never coerced. Suppliers shall not employ anyone under the age of fifteen (15) years with the exception of conventions outlined in the International Labour Organization Standards (ILO). At no time shall any employee under the age of eighteen (18) be subject to an unhealthy, unsafe, or compromisingly amoral environment.

By executing this Agreement Supplier acknowledges the Protocol and agrees to comply with its terms. In the event of any violation of this Protocol, suppliers shall immediately ensure the confidentiality and safety of all personnel involved in promptly reporting and correcting any violation of human rights. A violation of this Protocol will constitute a material breach of this Agreement.

Bloomberg’s Protocol draws upon the guidance and standards set forth by the following organizations:

- Electronic Industry Code of Conduct
- International Labour Organization Standards (ILO)
- ILO Code of Practice in Safety and Health
- Universal Declaration of Human Rights
- Social Accountability International (SAI)
- Ethical Trading Initiative (ETI)
ENVIROMENTAL SURVEY FOR ELECTRONICS RECYCLERS

Company:
Address:

Other Addresses:

Contact Name:
Voice No:
Fax No:
Email:
Website:

1) Please provide a description of your business and operations.
   For example: number of employees, years of operation, ownership and any ownership changes, facilities and their history, operations and services offered.

2) What materials do you process and Where do you send them?
   a) General IT and High Tech:
   b) Metal:
   c) Plastic:
   d) Packing Materials (Cardboard, Foam):
   e) Toxic Waste/Batteries:
   f) Others:

3) What do you do with the used equipment that you receive? For example, what processing do you do to make electronics you receive ready for resale or recycling?

4) What is your data security process for IT equipment that you receive (Hard drive erasure/destruction)?

5) Do you export any materials? If so, what is the purpose of the export? What are the names of the importing facilities and countries of location? Please provide documentation of legality.

6) What materials are sent from your facility and where do you send them?

7) Do you send waste materials offsite for disposal in landfills or for incineration?

8) Do you currently have outlets for all of the materials you receive and materials you generate?

9) What is the difference in terms of volume between the input of electronics to your company vs. the output (via recycling or resale) and what is the difference with respect to the facility at issue in particular?

10) Do you audit the facilities that receive materials from you?

11) Do you provide documentation or certification of final disposition?

12) Do you generate waste that is regulated, e.g. hazardous waste?
13) Are you subject to environmental, health and safety regulation? If so, please describe.

14) What regulatory agencies have jurisdiction over your facilities and operations?

15) What environmental, health and/or safety permits, licenses, and registrations are required? Do you have them?

16) What agency notifications are required? Have you provided them?

17) Are you in compliance with all applicable regulations and permits?

18) What is your compliance history? For example, has your facility been inspected by federal, state or other government agencies having jurisdiction over environmental, health or safety matters within the last five (5) years? If so, with what results?

19) Are you currently subject to any investigations or proceedings relating to any environmental, health or safety matters? Do you have any notices of violations that remain unresolved?

20) Do you store any products or wastes outdoors?

21) Do you have an environmental management system, environmental risk management plan, or electronics recycling certification in place? Please describe.
   For example, as to electronics recycling in particular are you certified or do you follow: "e-Stewards", "Electronics Recycler's Pledge of True Stewardship", Responsible Recycling "R2" Practices, "Plug into eCycling" guidelines, Recycling Industry Operating Standard ("RIOS"), Institute of Scrap Recycling Industries Electronics Recycling Operating Practices, "Certified Electronics Recycler®", ISO 9000 and/or ISO 14000.

22) Do you perform regular environmental, health and safety audits of your operations?

23) Do you have a trained employee who is responsible for environmental, health and safety onsite?

24) Do you provide environmental, health and safety training to your employees?

25) Do you have environmental insurance?

26) Will you allow verification through an on-site evaluation?

27) Please provide references and contact information for other businesses that have used your services.

28) Are you certified as e-Steward, R2/Rios, or ISO 14001? If yes, what certification do you have for each location?
GENERAL STANDARDS OF CONDUCT AND ETHICAL BEHAVIOR

Employees have an obligation to conduct themselves and our business with the highest ethical standards, with integrity and within guidelines that prohibit actual or potential conflicts of interest or the perception of impropriety. This high degree of ethics imposed upon us applies to everything we do and can have serious implications and repercussions to Bloomberg’s reputation and business dealings. Therefore, it is imperative that all employees are in compliance with Company standards, policies and procedures relating to conduct, ethics, integrity, objectivity, confidentiality, use of inside information and conflicts of interest contained within this Guide and as defined in the Confidentiality Agreement executed at the start of employment.

Any employee who has a question about whether a situation he or she is in, or may enter into, may violate Bloomberg’s standards of conduct should speak to his or her manager, a Professional Development representative, Melinda Wolfe or Peter Grauer.

In support of our Standards of Conduct and Ethical Behavior and to maintain Bloomberg’s integrity, we provide an anonymous Bloomberg Hotline, which is available 24 hours a day, 7 days a week at +1-212-617-1595 ((801)1595) or +1-800-777-7217 (toll free in the U.S.), for individuals to report misconduct or unethical behavior, or to ask whether a particular situation constitutes misconduct or unethical behavior. All calls are confidential, and employees can choose to make their calls anonymously. Employees have an obligation to report a suspicion or knowledge of misconduct, and failure to do so constitutes a violation of our policy. Bloomberg prohibits retaliation against an employee who in good faith raises a concern or reports suspected or actual misconduct. Issues raised on the hotline will be forwarded to and addressed by the appropriate individuals within the Company.

Depending on position or department, standards, guidelines and policies other than those set forth below may also apply, and will be either discussed with or distributed to employees by their department manager.

Depending upon the circumstances, failure to comply with the following general standards may, in Bloomberg's sole discretion, result in disciplinary action up to and including termination of employment. Because it is not possible to list every type of inappropriate conduct, the following list is not exhaustive nor a limitation on Bloomberg's right to discipline or terminate its employees. Therefore, employees should talk to their managers or Professional Development if unsure of what to do in a given situation.

1. Dishonesty, embezzlement, theft (including but not limited to theft of information or time), unauthorized removal or possession of property, or conviction of a crime.
2. Fraud or deliberate entry of false or misleading information in the Company’s books or records.
3. Misrepresentation, either verbal or written, or falsification of Company documents including, but not limited to, employment applications.
4. Immoral or indecent conduct.
5. Insubordination (including, but not limited to, refusal to perform work assigned as well as disrespectful conduct toward superiors, co-workers, suppliers or customers).
6. Unauthorized use, possession, distribution, purchase or sale of, or impairment caused by, controlled dangerous substances or alcohol on Company time or in Company facilities.
7. Harassment or impermissible discrimination against others including, but not limited to, co-workers, subordinates, suppliers or customers.
8. Accepting employment with, or providing services to, any person or entity other than Bloomberg, even on non-Bloomberg time, without Bloomberg’s prior written approval. This prohibition includes, but is not limited to, acting as an employee, independent contractor, or agent of any other company; serving on the board of directors of another company or organization; or engaging in your own commercial endeavor. Any employee wishing to engage in any activity must first submit a written request to Professional Development setting forth in detail the nature of the proposed activity, and detailing why it would not interfere or conflict with the employee’s obligations to Bloomberg. Bloomberg reserves the right, in its sole discretion, to deny any such request.
9. Sabotage, loss, or damage to property or merchandise of the Company, customers, co-workers, vendors or contractors.
10. Excessive or otherwise improper personal use of Company equipment, facilities or services, including, but not limited to, electronic or voice mail, the Bloomberg Terminal, computers (including installing unauthorized software and/or hardware), telephones, copy machines, facsimile machines, postage or mail services.

11. Accessing, or attempting to access, any Company information or information contained in Company files or databases without having a legitimate business reason for doing so.

12. Failure to project a positive and professional image including, but not limited to, failing to wear attire appropriate for one’s position and engaging in unprofessional conduct with or in front of customers.

13. Disparagement of the Company, employees, competitors or customers.

14. Incompetence, inefficient and/or careless performance of duties, failure to maintain proper work standards, or other poor performance, as determined in the sole discretion of the Company.

15. Excessive or patterned absence or tardiness, or failure to promptly contact managers regarding absences and tardiness.

16. Possession, use, or distribution of dangerous weapons, such as knives, guns, explosives, or any other devices that jeopardize the safety or security of individuals and/or property on Bloomberg premises.

17. Disrespectful or intimidating conduct of any kind including, but not limited to, threats, whether express, implied or in jest.

18. Tape recording or video recording, or attempting to tape record or video record other employees without their knowledge or consent except for Company authorized Telephone Monitoring as described in Section 5.

19. Failure to comply with applicable country, state or local tax requirements.

20. Violation of any other Company or department policy, procedure or rule, including those set forth in this Guide.

21. Involvement in any activities that could be considered to be a bribe or any form of unethical inducement or payment including facilitation payments of kickbacks.

22. Failure to report any bribe or unorthodox payment or inducement.
Globalization and sourcing diversification create unique opportunities and challenges for supply chain management. Bloomberg is committed to working with our suppliers to ensure that their operations are efficient, safe and sustainable and that they support our own sustainability objectives. We have developed a comprehensive Supplier Code of Conduct (“Code”) which defines our requirements with respect to environmental, social and governance performance of our suppliers.

This Code is based on the Electronic Industry Citizenship Coalition’s Code of Conduct, and applies to all Bloomberg suppliers globally, including but not limited to the following:

- Manufacturing
- Assembling
- Packaging
- Marketing
- Transportation and Logistics
- Scrapping and Recycling
- Constructing and Facilities Management
- Services, including professional services, event management, janitorial services, and pest control
- Paper
- Office supplies
- Premiums

To adopt this Code and become a participant (“Participant”), a business shall declare its support for the Code and actively pursue conformance to the Code and its standards in accordance with a management system as herein.

Participants must regard the code as a total supply chain initiative. At a minimum, participants are also responsible to ensure its next tier suppliers act in a manner consistent with the Code.

Fundamental to adopting the Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates. The Code encourages Participants to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility, and business ethics. In addition to the EICC Code, this Code and our broader Supply Chain Sustainability Strategy draws upon guidance from the following:

- International Labor Organization (ILO) Conventions and Recommendations
- Universal Declaration of Human Rights
- Social Accountability International (SAI)
- Ethical Trading Initiative (ETI)
- UN Global Compact (UNGC)

The Code
The Code is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D adds standards relating to business ethics; Section E outlines the elements of an acceptable system to manage conformity to this Code.

A. LABOR
Participants are committed to upholding the human rights of workers, and to treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student,
contract, direct employees, and any other type of worker. The recognized standards, as set out in the annex, were used as references in preparing the Code and may be a useful source of additional information.

The labor standards are:

1) Freely Chosen Employment
Forced, bonded (including debt bondage) or indentured labor, prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Excessive fees are unacceptable and all fees charged to workers must be disclosed.

2) Child Labor Avoidance
Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers.

3) Working Hours
Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, except in emergency or unusual circumstances, a typical workweek should not be more than 60 hours per week and workers shall be allowed at least one day off per seven-day week.

4) Wages and Benefits
Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Bloomberg expects suppliers to provide wages and benefits that are sufficient to cover, at a minimum, workers' basic needs plus some discretionary income. In compliance with local laws, workers shall be compensated for overtime. Deductions from wages as a disciplinary measure shall not be permitted. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation.

5) Humane Treatment
There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

6) Non-Discrimination
Participants should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status, or any other category protected by applicable law in hiring and employment practices such as promotions, rewards, and access to training. Companies shall apply the principle of equal pay for men and women workers for work of equal value. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

7) Freedom of Association
Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labor unions, seek representation, and join workers' councils, and bargain collectively in accordance with local laws shall be respected. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.
If freedom of association and/or the right to collective bargaining are restricted by law, the Participant shall, without violating applicable law itself, not interfere with efforts by workers to develop parallel means for independent and free association and collective bargaining.

B. HEALTH and SAFETY
Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.

The health and safety standards are:
1) Occupational Safety
Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Workers shall not be disciplined for raising safety concerns.

2) Emergency Preparedness
Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

3) Occupational Injury and Illness
Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

4) Industrial Hygiene
Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

5) Physically Demanding Work
Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and mitigated.

6) Machine Safeguarding
Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

7) Sanitation, Food, and Housing
Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Participant or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.
C. ENVIRONMENTAL
Participants recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

The environmental standards are:

1) Environmental Permits and Reporting
All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

2) Pollution Prevention and Resource Reduction
Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

3) Hazardous Substances
Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Suppliers shall comply with the Restriction of Hazardous Substances Directives included in the Institute of Electrical and Electronics Engineers (IEEE) publication 1608.

4) Wastewater and Solid Waste
Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

5) Air Emissions
Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

6) Product Content Restrictions
Participants are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

In addition to the environmental provisions laid out in this Code, Bloomberg has developed a series of operational guidelines called BGREEN. The BGREEN OPERATIONAL GUIDELINES include:
- 3rd Party Printer Guidelines
- BLP Green Construction Policy
- Waste Management Policy
- Green Cleaning Policy
- Integrated Pest Management Policy
- Sustainable Warehouse Guidelines
- Corporate Green Events Policy

Suppliers are also required to comply with the relevant policies and guidelines contained in BGREEN which will be sent along with this Code, and can be accessed online at www.bloomberg.com/bsustainable in our comprehensive sustainability report.

D. ETHICS
To meet social responsibilities and to achieve success in the marketplace, Participants and their agents are to uphold the highest standards of ethics including:
1) Business Integrity
The highest standards of integrity are to be upheld in all business interactions. Participants shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion, embezzlement (covering promising, offering, giving or accepting any bribes), and facilitation payments. All business dealings should be transparently performed and accurately reflected on Participant's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

2) No Improper Advantage
Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

3) Disclosure of Information
Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain, are unacceptable.

Bloomberg reserves the right to request anti-corruption policies and procedures of Participant, Participant's subsidiaries and affiliates, and agents of Participant and/or agents of Participant's subsidiaries and affiliates.

4) Intellectual Property
Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

5) Fair Business, Advertising and Competition
Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.

6) Protection of Identity
Programs that ensure the confidentiality and protection of supplier and employee whistleblower are to be maintained.

7) Responsible Sourcing of Minerals
Participants shall have a policy to reasonably assure that the columbite-tantalite (coltan), cassiterite, tin, tungsten, wolframite and gold or their derivatives, or any other minerals or their derivatives identified as "conflict minerals" in or pursuant to Section 1502(e)(4) of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and any applicable amendments thereto (the "Dodd-Frank Act") in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo, an adjoining country or any other country covered in the Dodd-Frank Act. Upon Bloomberg's request, Participants shall furnish Bloomberg any and all due diligence measures undertaken by Participant to determine said conclusion.

8) Privacy
Participants are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Participants are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

9) Non-Retaliation
Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

E. MANAGEMENT SYSTEM
Participants shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant’s operations and products; (b) conformance with this Code;
and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

1) **Company Commitment**
   A corporate social and environmental responsibility policy statement affirming Participant’s commitment to compliance and continual improvement, endorsed by executive management.

2) **Management Accountability and Responsibility**
   The Participant clearly identifies company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

3) **Legal and Customer Requirements**
   A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

4) **Risk Assessment and Risk Management**
   A process to identify the environmental, health and safety and labor practice and ethics risks associated with Participant’s operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5) **Improvement Objectives**
   Written performance objectives, targets and implementation plans to improve the Participant’s social and environmental performance, including a periodic assessment of Participant’s performance in achieving those objectives.

6) **Training**
   Programs for training managers and workers to implement Participant’s policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

7) **Communication**
   A process for communicating clear and accurate information about Participant’s policies, practices, expectations and performance to workers, suppliers and customers.

8) **Worker Feedback and Participation**
   Ongoing processes to assess employees’ understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

9) **Audits and Assessments**
   Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

10) **Corrective Action Process**
    A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11) **Documentation and Records**
    Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

12) **Supplier Responsibility**
    A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.
# BLOOMBERG GLOBAL CORE GUIDE

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1. Important Information about This Global Core Guide and Your Employment

This Global Resource and Information Core Guide (referred to herein as the "Guide") and the supplement specific to your region, where applicable, are designed to acquaint you with Bloomberg L.P. and its subsidiaries (referred to herein as "Bloomberg" or the "Company") and to provide you with supplemental information about your working conditions, benefits, responsibilities and some of the policies affecting your employment. You should read, understand, and comply with all provisions of this Guide. You should also consult your offer letter and/or employment contract, where applicable, for additional terms and conditions that may apply and supersede the terms herein.

No guide can anticipate every circumstance or question about policy. As Bloomberg continues to grow, the need may arise, and Bloomberg reserves the right, to revise, supplement, or rescind any policies or portion of this Guide at any time as it deems appropriate, in its sole and absolute discretion, as permitted by applicable law. Since the hard copy of the Guide shall only be re-distributed periodically, the most current version will always be available under HR<GO> or IDOC<GO> for your region on the terminal.

2. General Professional Development Policies

Employee Status and Flexible Work Arrangements

Bloomberg seeks to support our employees’ abilities to manage both their work and personal responsibilities. We recognize that throughout an employee’s career, a formal flexible working arrangement may be needed, or that on an ad hoc basis, some form of informal flexibility may be necessary. Varying work hours or work location provides an opportunity to ensure that both business objectives and personal needs can be met through creative ways of working.

Bloomberg will consider requests for a formal flexible work arrangement on a case-by-case basis and retains sole and absolute discretion in deciding whether such requests will be granted, as permitted by applicable law. In making its decision, Bloomberg will consider a number of factors including, but not limited to, the impact that a flexible schedule would have on the Company’s business, operations and ability to service its customers; the effect that the request would have on the employee’s co-workers; the reason for the request, only if the request is to work from home; whether there are any other reasons for refusing or granting the request; and the impact on the employee if the request is refused. Compensation for part-time work will be commensurate with the role being performed and pro-rated according to time worked. The full flexibility policy and related forms can be found at HR<GO>.

Equal Employment Opportunity

Bloomberg is committed to a policy of attracting, retaining, developing and promoting the most qualified individuals without regard to race, color, religion or belief, sex, national or ethnic origin, ancestry, age, marital status, sexual orientation, gender identity, genetic predisposition or carrier status, veteran status, disability, or any other classification protected by law in your region. As such, all applicants and employees are treated in a non-discriminatory manner with respect to all terms and conditions of employment.

This policy governs all aspects of employment, including recruitment, selection, job assignment, promotion, lay-off, recall from lay-off, training, education, social and recreation programs, transfer, compensation, discipline, termination, and access to benefits.

Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action up to and including termination of employment. Anyone who believes that he or she has been the subject of discrimination should contact his or her manager, a Professional Development representative, Melinda Wolfe, Dan Doctoroff or Peter Grauer.
Sexual and Other Unlawful Harassment

Anti-Harassment Policy

Bloomberg is committed to providing employees with a professional working environment that is free from all forms of harassment and discrimination. Harassment of, or discrimination against, an individual or group on the basis of race, color, religion or belief, sex, national or ethnic origin, ancestry, age, marital status, sexual orientation, gender identity, genetic predisposition or carrier status, veteran status, disability, or other classification protected by law in your region, is prohibited. Harassment includes conduct that denigrates or shows hostility or aversion towards an individual based on a protected classification that (i) adversely affects such individual’s employment opportunities or working relationship with the Company, (ii) has the purpose or effect of unreasonably interfering with an individual's work performance, or (iii) creates an intimidating, hostile or offensive working environment.

Harassment may take different forms, and may involve, but is not limited to, visual displays, suggestive or offensive remarks or jokes, slurs or epithets of any kind, gestures, unwelcome sexual advances or demands, propositions, or unwanted physical contact. Whatever form it takes, the Company will not permit any employee to harass others with whom he/she has business interactions including, but not limited to other employees, customers and vendors, or permit any outsider to harass its employees. This is true, not only in the workplace, but in any work-related setting including business trips and business-related social events. All employees must comply with this policy and take appropriate measures to ensure that such conduct does not occur.

Reporting and Investigation

It is the responsibility of every employee to further the implementation of the Company’s policies forbidding discrimination and harassment and to ensure compliance within each business unit. In an effort to avoid any misunderstandings and foster open communication in the workplace, employees should, but are not required to, communicate their discomfort to those whom they feel are engaging in inappropriate conduct. Employees who believe they have been subjected to any kind of discrimination or harassment, whether or not they have confronted their alleged harasser, and employees who witness or are aware of discrimination or harassment, must immediately notify their manager (provided he/she is not the alleged discriminator or harasser), a Professional Development representative, Melinda Wolfe, Dan Doctoroff or Peter Grauer. Bloomberg will promptly investigate any complaint, and such investigation will, to the maximum extent feasible, remain confidential, on a strict need-to-know basis. However, investigation of such complaints may require disclosure to the accused individual and to other witnesses in order to gather pertinent facts. At the conclusion of its investigation, the Company will take whatever action, if any, it believes appropriate under the circumstances or to prevent the occurrence of such conduct in the future, including, but not limited to, training, re-assignment, demotion, compensation adjustment, or disciplinary action up to and including termination of employment. In addition, employees who make knowingly false reports may be subject to disciplinary action up to and including termination of employment.

Non-Retaliation

It is unlawful and expressly against Company policy for any person to retaliate against any other person for making a complaint of discrimination or harassment, or for cooperating in an investigation of any allegations of discrimination or harassment. Accordingly, individuals who report incidents of discrimination or harassment, or who cooperate in an investigation regarding any such allegations, will not be subject to any form of retaliation. An employee who believes that he or she has been retaliated against, or who believes that he or she has witnessed any form of unlawful retaliation, is required to report it immediately to his or her manager (provided he/she is not the alleged retaliator), a Professional Development representative, Melinda Wolfe, Dan Doctoroff or Peter Grauer. The reporting and investigation of allegations of retaliation will follow the procedures set forth above for the reporting and investigation of discrimination and harassment. Any person found to have retaliated against an
individual for reporting discrimination or harassment, or for participating in an investigation of allegations of any such conduct, may be subject to disciplinary action up to and including termination of employment.

Communication and Employee Problem Solving

For Bloomberg to succeed, we all must effectively and openly communicate with one another. Since information is only as good as its source, we encourage you to consult your manager, this Guide, or Professional Development should you have any questions.

Since we recognize that no job or organization is perfect and that problems or misunderstandings may arise from time to time, we are committed to working with our employees to solve our problems and learn from our mistakes. Employees experiencing any problems or complaints regarding the application of Company policies, payment of wages, harassment or discrimination as set forth above, discipline, or other concerns are encouraged to confer with their manager to resolve such issues. Thereafter, if the issue is not resolved, or if the problem involves their manager, employees are encouraged to contact a Professional Development representative, Melinda Wolfe, Dan Doctoroff or Peter Grauer, without fear of reprisal. The Company wants to listen to and handle your problems internally, but needs your cooperation to make the problem solving procedure work.

Violence in the Workplace

Bloomberg is committed to maintaining a working environment which is free from all forms of violence, including both physical and verbal offenses. Bloomberg does not tolerate violence or the threat of violence against any employee, client, vendor, visitor or other individual in, or arising out of, the workplace, or through Bloomberg’s communication systems. This prohibition also includes statements made in jest, horseplay, or any activity which can be perceived as intended to, or which may potentially result in, physical harm to any individual or physical damage to Bloomberg property. Employees aware of any threat (express or implied) or act of violence must immediately report such conduct to their manager, Security, or Professional Development.

Bloomberg will promptly investigate any report of any act of violence, and such investigation will, to the maximum extent feasible, remain confidential, on a strict need-to-know basis. However, investigation of such complaints may require disclosure to the accused individual and to other witnesses in order to gather pertinent facts. At the conclusion of its investigation, the Company will take whatever action, if any, it believes appropriate under the circumstances. The Company will not tolerate retaliation against any individual who reports workplace violence. Any employee found to have engaged in retaliation against another individual for reporting violence or a threat of violence may be subject to disciplinary action up to and including termination of employment. In addition, employees who make knowingly false reports may be subject to disciplinary action up to and including termination of employment.

Violations of this policy may result in disciplinary action up to and including termination of employment.

Reporting Relationships

While it is not Bloomberg’s intent to unreasonably delve into the personal lives of its employees, many problems are caused when employees are involved in personal relationships (including, but not limited to, being related by blood or marriage or having a romantic relationship of any kind) with other employees. Such problems include but are not limited to conflicts of interest, the appearance of favoritism and/or coercion, exposure to rivalry and discord, work scheduling conflicts, access to otherwise unavailable information, the undermining of the integrity of the Company’s operations and difficulties in discipline and performance assessment. In order to avoid preferential treatment based on familial relationships and the appearance of impropriety, and to maintain appropriate financial controls, the Company generally prohibits the hiring of any relative of current employees. For purposes of this policy, "relative" shall be interpreted to include for both the employee and his/her spouse or domestic partner, any of the following relations: grandparents, parents, siblings, children, grandchildren, aunts, uncles, nieces and
nephews, and first cousins, and any of their respective spouses or domestic partners. Furthermore, any employees involved in a personal relationship are prohibited from being in a direct reporting relationship or in the chain of command of one another, or otherwise participating in employment decisions involving one another. Employees’ failure to immediately notify Professional Development of any circumstances in which they or other employees may be in violation of this policy may result in disciplinary action up to and including termination of employment. If the Company, in its sole discretion, believes that personal relationships between employees directly or indirectly affect its business, the Company will resolve the situation as it deems necessary including, but not limited to, re-assignment, transfer, deciding not to hire a candidate and/or termination of employment.

**Work Authorization**

All employees must possess valid work authorization at all times. Every new employee must present such work authorization to Professional Development upon hire and every existing and/or transferring employee must secure the appropriate work authorization upon the expiration of current authorization and upon relocation of his/her employment.

In some circumstances Bloomberg may cover the costs for the procurement of permanent resident status, although in doing so employees must use the Company’s legal counsel. Employees may be asked to sign a permanent resident sponsorship agreement before Bloomberg will proceed with filing and incurring costs for permanent residence applications. For further details, contact Professional Development.

**Internal Job Postings/Transfers**

Bloomberg encourages employees to develop their careers in many ways, including providing opportunities to apply for other positions within the Company. All open positions will be listed on both Bloomberg.com and the career portal (PATH <GO>).

**Applicant Policy**

Employees who have completed 18 months in their current role and have been in good standing and maintained a rating of “Meets Expectations” or better during this timeframe are eligible to apply for internal opportunities.

*If you are unsure of your rating, please visit EVAL <GO> or contact your PD Relationship Manager. *Managers are encouraged to support eligible internal applicants throughout the process.

**Employee Communication with Manager Policy**

Employees are responsible for alerting their manager about their interest/activity in pursuing an internal role when being strongly considered.

An employee is “strongly considered” when a hiring manager is interested in an internal candidate based on screening (informal conversations, PD initial interview, if applicable) or first-round interviews. Recruiters will notify employees when they are being strongly considered, at which point employees should notify their manager.

Informal discussions between an employee and an internal recruiter, PD Relationship Manager or hiring manager are encouraged to determine the interest level of both parties. Only Professional Development will be aware of employee applications submitted via PATH<GO>.

Any concerns regarding notifying your manager should be discussed with your PD Relationship Manager.
Employee Transition Policy

Employee transfers will take place as soon as 30 days from the time an offer is extended but no longer than 90 days unless other arrangements are agreed upon by the receiving and current managers.

Relocation and Transfer

Where job opportunities exist outside the employee’s current location, Bloomberg will, at its discretion, provide relocation assistance to support employees with their move and transition to that new location. Relocation assistance may vary based on the reason for the transfer and in line with the needs of the business. In the event the employee leaves the Company within a specified period of time following a relocation, the employee may be obligated to pay back a pro-rated portion of the relocation assistance received. Failure to repay the amount due may result in legal action taken by the Company against the employee. Please contact your PD Relationship Manager for any questions regarding relocation assistance.

Travel and Business Expenses

Bloomberg recognizes that many employees incur travel and business expenses in the course of performing their jobs. Given such, employees will be reimbursed for actual, reasonable and necessary expenditures incurred while travelling and conducting business for the Company, provided, that such expenses were incurred in accordance with Bloomberg’s policy. For further details, see EXPT<GO>, EXPN<GO>, HELP<GO> on the terminal, enter a CIAO ticket or contact the EXPN team.

Leaving the Company

Employees who resign from the Company should consult their contract, where applicable, for the appropriate notice period. Employees who are at-will are asked to provide their manager and/or a Professional Development representative with two weeks’ advanced written notice, or with whatever notice may be prescribed by applicable law, of their intended resignation. Employees are to complete an exit interview with Professional Development prior to leaving. Employees who leave the Company for any reason are required to return all Company property including, but not limited to, such items as identification cards, Resource and Information Guides, travelers, telephones, hand-held devices, beepers, contact lists, software, books, and computer equipment; to remedy all outstanding loans (including repayment of any tuition or relocation expenses that are owed to the Company, per the applicable policy, at the time of employee’s resignation), expense reports and credit card bills; and to complete the applicable benefit forms.

Because Bloomberg values the loyalty of its employees, it will not normally rehire employees who leave the Company to work for another company. In some situations, however, Bloomberg may consider rehiring individuals who leave the Company for personal reasons such as health problems, to raise a family, to care for a family member, or to attend school.

3. Employee Responsibilities

General Standards of Conduct and Ethical Behavior

Employees have an obligation to conduct themselves and our business with the highest ethical standards, with integrity and within guidelines that prohibit actual or potential conflicts of interest or the perception of impropriety. This high degree of ethics imposed upon us applies to everything we do and can have serious implications and repercussions to Bloomberg’s reputation and business dealings. Therefore, it is imperative that all employees are in compliance with Company standards, policies and procedures relating to conduct, ethics, integrity, objectivity, confidentiality, use of inside information and conflicts of interest contained within this Guide and as defined in the Confidentiality Agreement or similar provisions executed at the start of employment IDOC 1312275.
Any employee who has a question about whether a situation he or she is in, or may enter into, may violate Bloomberg's standards of conduct should speak to his or her manager, a Professional Development representative, Melinda Wolfe or Peter Grauer.

In support of our Standards of Conduct and Ethical Behavior and to maintain Bloomberg’s integrity, we provide an anonymous Bloomberg Hotline, which is available 24 hours a day, 7 days a week at _____________ or ______________, for individuals to report misconduct or unethical behavior, or to ask whether a particular situation constitutes misconduct or unethical behavior. All calls are confidential, and employees can choose to make their calls anonymously. Employees have an obligation to report a suspicion or knowledge of misconduct, and failure to do so constitutes a violation of our policy. Bloomberg prohibits retaliation against an employee who in good faith raises a concern or reports suspected or actual misconduct. Issues raised on the hotline will be forwarded to and addressed by the appropriate individuals within the Company.

Depending on position or department, standards, guidelines and policies other than those set forth below may also apply, and will be either discussed with or distributed to employees by their department manager.

Depending upon the circumstances, failure to comply with the following general standards may, in Bloomberg's sole discretion, result in disciplinary action up to and including termination of employment. Because it is not possible to list every type of inappropriate conduct, the following list is not exhaustive nor a limitation on Bloomberg's right to discipline or terminate its employees. Therefore, employees should talk to their managers or Professional Development if unsure of what to do in a given situation.

1. Dishonesty, embezzlement, theft (including but not limited to theft of information or time), unauthorized removal or possession of property, or conviction of a crime.

2. Fraud or deliberate entry of false or misleading information in the Company's books or records.

3. Misrepresentation, either verbal or written, or falsification of Company documents including, but not limited to, employment applications.

4. Immoral or indecent conduct.

5. Insubordination (including, but not limited to, refusal to perform work assigned as well as disrespectful conduct toward superiors, co-workers, suppliers or customers).

6. Unauthorized use, possession, distribution, purchase or sale of, or impairment caused by, controlled dangerous substances or alcohol on Company time or in Company facilities.

7. Harassment or impermissible discrimination against others including, but not limited to, co-workers, subordinates, vendors, contractors, suppliers or customers.

8. Accepting employment with, or providing services to, any person or entity other than Bloomberg, even on non-Bloomberg time, without Bloomberg’s prior written approval. This prohibition includes, but is not limited to, acting as an employee, independent contractor, or agent of any other company; serving on the board of directors of another company or organization; or engaging in your own commercial endeavor. Any employee wishing to engage in any activity must first submit a written request to Professional Development setting forth in detail the nature of the proposed activity, and detailing why it would not interfere or conflict with the employee's obligations to Bloomberg. Bloomberg reserves the right, in its sole discretion, to deny any such request.

9. Sabotage, loss, or damage to property or merchandise of the Company, customers, co-workers, vendors or contractors.
10. Excessive or otherwise improper personal use of Company equipment, facilities or services, including, but not limited to, electronic or voice mail, the Bloomberg terminal, IB<GO>, MSG<GO>, BLOG<GO>, CHAT<GO>, Internet, computers (including installing unauthorized software and/or hardware), telephones, travelers, copy machines, facsimile machines, hand-held devices, postage or mail services, mainframe access and networks, and communications media.

11. Accessing, or attempting to access, any Company information or information contained in Company files or databases without having a legitimate business reason for doing so.

12. Failure to project a positive and professional image including, but not limited to, failing to wear attire appropriate for one’s position and engaging in unprofessional conduct with or in front of customers.

13. Disparagement of the Company, employees, competitors or customers.

14. Incompetence, inefficient and/or careless performance of duties, failure to maintain proper work standards, or other poor performance, as determined in the sole discretion of the Company.

15. Excessive or patterned absence or tardiness, or failure to promptly contact managers regarding absences and tardiness.

16. Possession, use, or distribution of dangerous weapons, such as knives, guns, explosives, or any other devices that jeopardize the safety or security of individuals and/or property on Bloomberg premises.

17. Disrespectful or intimidating conduct of any kind including, but not limited to, threats, whether express, implied or in jest.

18. Tape recording or video recording, or attempting to tape record or video record, other employees, clients, customers, vendors or third parties without their knowledge or consent, except for Company authorized Telephone Monitoring as described in Section 5.

19. Failure to comply with applicable country, state or local tax requirements.

20. Violation of any other Company or department policy, procedure or rule, including those set forth in this Guide.

21. Involvement in any activities that could be considered to be a bribe or any form of unethical inducement or payment including facilitation payments or kickbacks.

22. Failure to report any bribe or unorthodox payment or inducement.

Conflicts of Interest

Employees must avoid situations where their personal interests could conflict with the interests of Bloomberg or could be perceived by others as doing so. Conflicts of interest arise when an individual’s position or responsibilities with Bloomberg present an opportunity for personal gain separate and apart from the direct rewards of employment, or when an employee’s personal interests are inconsistent with those of Bloomberg and could lead to his or her responsibilities with Bloomberg being compromised.

A conflict of interest, or the appearance of a conflict, may arise in a variety of circumstances and it is not possible to describe every situation. By example, however, a conflict occurs when an employee, relative of an employee, or individual with whom an employee has a personal relationship:
1. Directly or indirectly has a personal or financial interest in any transaction which is, or may be, adverse to Bloomberg; or

2. Engages in, or recommends, a business transaction for Bloomberg that results in personal profit or gain.

Beyond the clear cases of conflicts of interest described above, there are situations that are inconsistent with the high standards of business ethics required by Bloomberg, which cannot be compromised. If there is room for suspicion that an interest in, or connection with, another venture might affect, or reasonably appear to affect, an employee's exercise of judgment on behalf of Bloomberg, the interest or connection should not be entered into and, once identified, should be immediately brought to the employee’s manager’s attention.

Those who fail to adhere to this policy and their obligations will be subject to disciplinary action up to and including termination of employment and/or legal action.

Misuse of Confidential Information and Trading Restrictions

As a condition of employment, upon hire, employees are required to enter into confidentiality provisions or to sign Bloomberg’s Confidentiality Agreement IDOC 1312275. This requirement reflects the fact that Bloomberg employees have access to, and become familiar with, a broad range of highly sensitive confidential and proprietary information concerning Bloomberg and its customers. For example, Bloomberg employees may gain access to information that has not yet become publicly available while visiting a client or covering a news story. The protection of this information is critically important to Bloomberg’s reputation, relationships with its customers, and continued success. As discussed more fully below, Bloomberg’s policies regarding the protection of confidential information, as well as its requirement that its employees act with the highest degree of business ethics and avoid even the appearance of impropriety, necessarily impact employees’ personal investment activities.

Consistent with Bloomberg’s strict insistence on the protection of its and its customers’ confidential information, Bloomberg employees may not use or disclose information obtained on the job for any non-job related purpose. This prohibition includes, but is not limited to, employees’ use or disclosure of such information for their own or someone else’s personal or financial gain. In addition, employees may not misuse their positions at Bloomberg to impact improperly the securities markets. Thus, Bloomberg employees are prohibited from: (1) disclosing to others (with the exception of people inside the Company with a “need to know”) material, non-public information about the Company or its customers or suppliers that they obtained in connection with their work for the Company; (2) trading securities while in possession of material, non-public information concerning those securities (or their issuer) that they obtained in connection with their work for the Company; (3) buying or selling a security in advance of Bloomberg’s publication or dissemination of news, research, analysis or other information that could reasonably be expected to have an impact on that security’s price; (4) causing Bloomberg to disseminate news, research, analysis or other information for the purpose of affecting securities prices; or (5) engaging in any other investment activity that could compromise objectivity or give the appearance of impropriety or of taking unfair advantage of one’s position at Bloomberg.

Bloomberg employees are also discouraged from short selling, purchasing for short-term gain (i.e., selling securities within 30 days of purchasing them), or purchasing or selling any derivative instrument, since such activities are widely considered to be susceptible to abuse and can often give rise to the appearance of impropriety. Consequently, any Bloomberg employee who wishes to engage in such activities must receive advance, written permission to do so from Compliance. Employees seeking permission to engage in the above activities must submit an ASKHR ticket which will be routed to Compliance for consideration.

In addition, employees who work in or with certain groups (such as the various Tradebook companies, Research Products, BVAL, BDVD, CVAL, CRAT and News) may also be subject to other, more restrictive trading restrictions set forth in group-specific policies and/or guidelines, as they may be promulgated or amended from time to time.
The prohibitions set forth herein apply to employees' trading activities for their own accounts, for accounts in which they have a direct or indirect beneficial interest (including accounts for family members or friends) and for any other accounts over which they have discretionary authority or power of attorney.

For purposes of the prohibitions set forth above, “material non-public information” means any information that an employee learned in connection with his or her employment at Bloomberg that (a) is not generally available to the investing public, and (b) would be considered important by a reasonable person in deciding whether to buy or sell a particular security.

Employees should also be cognizant that their investment activities are also circumscribed by legal prohibitions on, among other things, the misuse of non-public information and on market manipulation. In that regard, the laws in many jurisdictions prohibit buying or selling securities based on non-public information. The laws in various jurisdictions also prohibit, under various circumstances, providing non-public information to another person for that person’s use in buying or selling securities (sometimes known as “tipping”). Thus, engaging in transactions based on non-public information or “tipping” may not only violate Bloomberg policy but also subject the wrongdoer to severe criminal and civil sanctions. Furthermore, any such violation by any employee of the Company could seriously damage the Company’s reputation and expose it to both embarrassment and legal claims. Consequently, employees must take care to ensure that their investment activities comply not only with Bloomberg policies, but also with the various legal prohibitions to which they may be subject.

When employees have any doubt whatsoever as to whether information in their possession is “material non-public information,” they should (i) treat the information as “material non-public information,” (ii) refrain from trading in the security to which such information relates, (iii) refrain from disclosing the information further, and (iv) promptly enter an ASKHR ticket to escalate to Compliance for review.

Those who fail to adhere to the restrictions set forth above will be subject to disciplinary action up to and including termination of employment and/or legal action.

**Gifts**

No employee or member of his or her family may, directly or indirectly, receive bonuses, fees, gifts, entertainment or sports tickets, or any other item that is of more than nominal value from any entity or person with whom Bloomberg does, or would like to do, business. An exception may be made for items that are only of token value. Upon receiving gifts, employees must contact Professional Development for guidance, and the Company reserves the right to dispose of such gifts as it deems appropriate. Bloomberg employees also may not offer gifts, money or entertainment to vendors or customers with whom they do, or would like to do, business without management consent.

**Social Media Activities**

Participation on the Internet by way of social media has reached an all-time high, and Bloomberg recognizes the positive impact that this means of communication can have on our business. Bloomberg recognizes that many employees engage in social media for personal use, and have represented our Company positively by mentioning our brands, products, news, and events.

The policy which can be found at HR<GO> sets forth the responsibilities of our employees when engaging in social media and also provides a list of prohibited subjects. The intent of the Social Media policy is not to restrict the flow of useful and appropriate information, but to minimize risk to the Company and its employees. Although the policy defines social media and its appropriate use, the standards outlined in the policy are meant to apply to new tools and technologies as they come into use in this rapidly-evolving field. Employees must adhere to the policy when engaging in social media activities. Violations of the policy may result in disciplinary action up to and including termination of employment.
Personal Data and Information

At various times during their employment, employees will be required to provide the Company or a Group Company with (or the Company or Group Company may collect) certain personally identifying data and information (“Personal Data and Information”). The Company uses this Personal Data and Information for purposes of the employment relationship, for administration and management purposes, for safety or security purposes, for business purposes, and to ensure compliance with Company policies and applicable laws and regulations. Personal Data and Information may include work authorization forms, address and contact information, dates of birth, emergency contact information, identification documents (e.g., drivers license, social security numbers, ID numbers), financial account information (e.g., compensation and banking information), information regarding education and employment history, medical/health information, data collected by Closed Circuit Television (CCTV) camera systems, location data (including as collected by a security badge system, company-issued devices, and/or personal portable or mobile devices used for business purposes), and any other personal or sensitive personal data, including, but not limited to, EEO information, information in connection with background checks and concerning a prior criminal record (where applicable), and any other information required by law or requested by Professional Development, the Company or a Group Company.

In addition, as a condition of employment, employees' personal telephone numbers will be made available so that other Bloomberg employees and certain vendors of the Company and any Group Company (e.g., advisors or consultants) may contact them outside the office, if necessary, for business-related reasons. Similarly, employees’ pictures will be made available for identification purposes. CCTV footage will also be recorded and reviewed by Company’s Risk Management team and/or its third party contractors for safety and security purposes.

Bloomberg will ensure that appropriate security measures are taken to prevent unlawful or unauthorized processing of Personal Data and Information and against the accidental loss of or damage to Personal Data and Information. Professional Development will hold, retain and destroy all Personal Data and Information in accordance with the policies of the Professional Development department and applicable law. Employees must provide the Company with accurate Personal Data and must notify Professional Development of any changes to their Personal Data and Information so that the Company can maintain accurate records, and may request access to their Personal Data and Information to ensure that it is correct and complete. Employees are also encouraged to forward all documents and materials containing Personal Data and Information -- including without limitation all evaluations, compensation and performance-related materials (whether they relate to the employee forwarding the materials or to other employees) -- to Professional Development for storage in accordance with Company policies. Managers and other supervisory employees outside of Professional Development should not maintain any such documents or materials for their own records.

The Company may share employees’ Personal Data and Information under the following circumstances:

1. With, between or among its offices, affiliates, subsidiaries and any successor entity;
2. With third parties who provide services to the Company or any Group Company such as benefit and payroll providers, administrators, legal and other advisors, tax consultants and security contractors;
3. In response to a subpoena, as part of a court order or tribunal process, government investigation, government request, or other legal or regulatory process; and
4. As is necessary to protect the rights, interests, safety, or property of the Company, its customers or others.

Personal Data and Information may be shared with and/or transferred to offices or third parties located outside the country in which the employee is based, including to the United States, that may have different levels of privacy protection than the employee’s country.
Use of employees’ Personal Data and Information for non-business reasons will result in disciplinary action up to and including termination of employment.

**Announcements, References and Other Requests for Information**

In accordance with their obligation to keep Company confidences, employees are required to refer all requests or inquiries from outside of the Company to the appropriate Company representative. Any inquiry from a government official, newspaper, magazine, blogger, broadcast media, book publisher, photographer, film producer or any other person seeking to publish information concerning the Company must be referred to the Public Relations department. This includes solicitations for information or inquiries about the Company from participants in social media, as well as requests to use the Company name or logo in advertisements, Web sites, publications and press releases. Employees may not make or confirm statements on behalf of, or concerning, the Company to the press or on social media (blogs, Web sites, social networks and Twitter and LinkedIn) without prior approval from the Public Relations department.

It is Bloomberg's policy to only verify former and current employees' position, current or final salary and dates of employment. In most regions, employees can access their own employment verification letter under the Personal Information section on MYPD<GO>. In regions where this is not available, employees should contact their PD Relationship Manager for assistance. No employee may give former or current employees a personal reference for employment or other purposes. However, employees may submit a request to their manager for a reference for entry into a school program and/or condominium/co-operative acceptance purposes if they have acceptable performance in their current job, as permitted by applicable law. Employees and their managers must bring such requests to the attention of Professional Development, and their managers and Professional Development will review such requests on a case-by-case basis to determine whether a reference will be given. Violations of this policy may result in further action, up to and including termination of employment.

**No Solicitation or Distribution**

Persons not employed by Bloomberg may not distribute literature or solicit on Company property for any purpose, at any time, nor may they post solicitation notices in our offices or on the terminal. Employees may not distribute literature or solicit other employees during work time or in work areas. While Bloomberg may maintain bulletin boards and other means of communicating important information, employees may only post notices after receiving authorization from Professional Development.

**Hosting Personal Guests**

When employees invite personal guests to Bloomberg, it is their responsibility to ensure their personal guests leave the building when their visit is over. While Bloomberg is happy to have employees show its offices to friends and family, employees should not conduct personal meetings in Bloomberg offices. Especially with a shortage of conference room space, personal meetings should be conducted outside the building.

**Hosting External Events at Bloomberg**

Bloomberg generously opens its office space for business-related tours and meetings. Generally, our offices are used only for customers, internal business or to support approved philanthropic relationships. With conference and meeting space at a premium, employees are not permitted to host meetings or tours for external organizations at Bloomberg. Business-related events may be held at the discretion of the department manager; related expenses must be covered by that business group.
Substance Abuse and Testing

Bloomberg has a vital interest in providing safe and healthy working conditions for its employees as well as its vendors and customers. Bloomberg, therefore, is committed to maintaining a workplace free from the influence of drugs and alcohol and at the same time is committed to assisting in the rehabilitation of those employees who voluntarily request assistance.

In furtherance of this policy, employees who use, possess, store, distribute, purchase, manufacture or who are under the influence of illegal or non-prescribed drugs or alcohol while working or otherwise on Bloomberg’s premises or vehicles are subject to immediate termination, as permitted by applicable law. Bloomberg reserves the right to, and may, in its sole discretion, require an employee to undergo drug or alcohol screening where it reasonably suspects the employee to be under the influence of illegal or non-prescribed drugs or alcohol while working or otherwise on Bloomberg's premises or vehicles. Any employee refusing to cooperate in such testing as required may be subject to discipline, up to and including termination of employment.

Employees who test positive for illegal or non-prescribed drugs or alcohol, or who are otherwise determined to have violated this policy, may, depending on the circumstances and in the sole discretion of Bloomberg, be terminated or permitted to undergo rehabilitation, counseling and/or treatment. If after such treatment, satisfactory evidence of rehabilitation is presented, Bloomberg, in its sole discretion, may return the employee to work, subject to periodic random testing for a period of time deemed appropriate by Bloomberg or as may be required by applicable law. If the employee refuses to follow the recommended rehabilitation, counseling, treatment and/or after-care program or refuses to be subject to follow-up testing or tests positive in any subsequent test or otherwise violates this policy, the employee may be subject to immediate termination of employment, as permitted by applicable law.

Employees with drug and/or alcohol problems are encouraged to come forward and voluntarily seek help. Prior to conducting leading to a request to submit to a drug/alcohol screen an employee may request to participate in an approved rehabilitation, counseling and/or treatment program. Bloomberg, in its sole discretion, may grant such employee a leave of absence or time off to attend such program(s). Following the completion of such program(s), the employee may be periodically tested on a random basis for a period of time deemed appropriate by Bloomberg or as may be required by applicable law. If the employee refuses to follow the recommended treatment program and/or after-care program or refuses to be subject to follow-up testing or tests positive in any subsequent test or otherwise violates this policy, the employee may be subject to immediate termination of employment, as permitted by applicable law.

Testing information and results under this policy will not be disclosed to anyone at Bloomberg who does not have a legitimate bona-fide need to know.

No Smoking

All Bloomberg employees must work together to maintain the highest possible level of safety and mutual comfort. Accordingly, smoking is not permitted in Bloomberg facilities, including Company vehicles, outdoor office space, or within close proximity of the entrances to our facilities.

This policy applies equally to all employees, vendors, customers and visitors. Violation of this policy may subject employees to disciplinary action up to and including termination of employment.

No retaliatory adverse personnel action will be taken with respect to any employee for lodging complaints or concerns regarding compliance with this policy. Any employee or applicant who believes he or she has suffered any such retaliatory action should contact Professional Development.
Political Contributions

In the context of conducting Bloomberg business, no employee shall apply any pressure or make any suggestion or threat, direct or implied, that failure to make a political contribution or participate in political activity will result in some disadvantage, or that making a contribution may result in some advantage, nor may any person provide, or withhold any benefit, inducement or reward, concerning Bloomberg’s business, to another employee, consultant, vendor or client in an effort to influence that person’s decision to support a political candidate or party.

Use of Cellular Telephone or Hand-Held Device While Driving

Cellular telephone conversations, the use of hand-held devices and other similar distractions are to be avoided while driving. While the Company supports the use of cellular telephones and hand-held devices for business purposes, we prohibit employees from using cellular telephones or hand-held devices to conduct business while driving. If an employee needs to make or take a business call, or send or view a text message or e-mail, while driving, the employee should pull off the road and stop in a safe location, if practicable, prior to using the cellular telephone or hand-held device. In addition, the Company expects that all employees comply with applicable laws regarding the use of cellular telephones and hand-held devices while operating a motor vehicle.

Intellectual Property

Bloomberg is committed to robust and fair competition. Consequently, Bloomberg requires all of its employees to sign a Confidentiality Agreement or similar provisions to help protect its intellectual property and respect the intellectual property rights of others. Employees may not misuse the confidential or proprietary information or trade secrets of the Company or of a third party, regardless of how they discover this information. Employees must not use third party copyrighted material without the authority of the owner, unless the Company’s lawyers have advised that this use is lawful. In addition, employees must not consciously misuse the Company’s or a third party’s trademarks or service marks or seek to appropriate the goodwill associated with such marks.

Bribery and Corruption

Bloomberg values its reputation for ethical behavior and has a zero tolerance commitment against bribery and corruption in any form in any jurisdiction in which Bloomberg operates. Full details of Bloomberg's policy on bribery and corruption, which all employees are required to adhere to, is set out at HR ANTI-CORRUPTION<GO>.

4. Absences, Time Off and Holidays

Absences and Tardiness

Employees are expected to be at work and to report on time. If they expect to be late, employees must promptly contact their manager to state the reason for such lateness and when they expect to arrive at work. Employees who are unable to report to work due to illness, injury or any other reason must notify their manager and provide the reason for their absence at least one hour before their normal starting time. Further conditions may apply in your region. Employees should consult their contract, where applicable, or Professional Development for more information.

Paid Time Off/Holidays/Leaves

Since employees generally need time off for various reasons including rest, relaxation, handling personal matters, and religious observances, Bloomberg may provide employees with paid time off. In addition, employees may be entitled to holidays and additional leaves. Employees should consult their contracts, where applicable, or speak to their manager or Professional Development to determine their time off, holiday and leave entitlement.
Jury Duty/Civic Duty Leave

Bloomberg encourages its employees to fulfill their civic responsibilities by granting time off to serve jury duty/civic duty leave. Where applicable, Bloomberg may pay employees their full salary while on such leave.

Before such leave will be granted, employees must submit a copy of their jury notice or other acceptable documentation to their manager as soon as they receive it. Employees who are not required to serve as a juror on a scheduled work day, or who are released prior to the end of the regular workday, must return to work. To be paid for such leave, proof of actual jury service or other acceptable proof must be presented to Professional Development upon return to work.

5. Security, Facilities and Equipment

Company Equipment

In order to assist employees in performing their jobs, Bloomberg provides certain equipment and materials including, but not limited to, electronic mail, voice mail, telephones, Internet, postage, copy and fax machines, personal computers, travelers, hand-held devices, other hardware/software, mainframe access and networks, and communications media (collectively, “Company Equipment”). Such Company Equipment is and shall remain the property of Bloomberg at all times. For purposes of recruitment and the employment relationship, to ensure compliance with Company policies and applicable laws and regulations, and to maintain the safety and security of employees, customers, vendors, visitors, data and facilities, the Company reserves the right to access, inspect, review, monitor, copy, remove, change, transfer and/or disclose the contents of such Company Equipment, or of any communications made using Company Equipment, at any time and without notice, by any means.

Company Equipment is made available to employees for use only in connection with the Company’s business and may not be used for personal or other reasons. Accordingly, employees should not expect privacy in their communications made using Company Equipment. All computer equipment must be approved by the Company and installed by a PC support representative. This includes, but is not limited to, all software packages, hardware, keyboards, mice, USB keys, and cameras. Employees are responsible for the safekeeping of the Company Equipment in their possession. Unauthorized use, abuse, loss, destruction or personal use of Company Equipment is strictly prohibited. Personal Data may be acquired by or as a result of use of Company Equipment and such Personal Data shall be treated in accordance with this Global Employee Resource Guide.

Employees may be required to sign a receipt that they have received specific Company Equipment. Upon request and/or separation from the Company, all Company Equipment must be returned immediately to Bloomberg, and all software and/or mobile applications must be deleted.

To the extent you use your own personal equipment and/or software to access the Company’s mainframe and networks or any other Company communication or computer systems, these guidelines apply to such equipment and/or software as well.

Violation of this policy may result in disciplinary action up to and including termination of employment and/or legal action.
Use of Software and Electronic Communications

In addition to the above, the following guidelines, which are not all-inclusive, have been established to ensure that employees understand the Company’s expectations with regard to the use of software, the Internet, BLOG<GO>, IB<GO>, MSG<GO>, CHAT<GO> and other email systems, as well as any other means of electronic communication (collectively, “Company Communications Systems”). For purposes of recruitment and the employment relationship, to ensure compliance with Company policies and applicable laws and regulations, and to maintain the safety and security of employees, customers, vendors, visitors, data and facilities, Bloomberg reserves the right to inspect, review, access or monitor employees’ use of Company Communications Systems, at any time and without further notice, to ensure compliance with these guidelines, other Company policies and/or applicable law. In this regard, employees should be aware that the use of Internet, email and blogging accounts, including without limitation Gmail, AOL, Hotmail, Yahoo, Facebook, MySpace and Twitter, leaves trace data and information on Company Communications Systems and Company Equipment and, as such, may be subject to review by the Company. Improper use of Company Communications Systems and Company Equipment may result in disciplinary action up to and including termination of employment and/or legal action.

• Any software that is purchased by Bloomberg may only be installed on Company Equipment by a PC support representative. Software is often governed by strict copyright and trademark laws and may not be copied unless authorized by its publisher in writing.

• Use of Company Communications Systems is limited to authorized Company business only. With regard to CHAT<GO> in particular, employees are not to engage in any discussion which may create potential conflicts of interest or the appearance of impropriety. Employees are not to "hack" or otherwise obtain unauthorized access into Company Communications Systems or any other communications system.

• Internet access is provided to meet the Company’s business needs only; it is not intended for personal use. In order to protect the security of Company Equipment and Company Communications Systems, downloading of any programs, data, or other material, unless expressly approved by management, is strictly prohibited. Not only is the Company concerned about inappropriate materials and copyright infringement, but also special care is especially needed to protect against the spread of viruses.

• Uploading of any programs, data, photographic, video, or other material from Company Communications Systems or Company Equipment, unless expressly approved by management, is strictly prohibited.

• The Company is interested in protecting its confidential and proprietary information and prohibiting the unauthorized use, disclosure, reproduction, and/or distribution of its property. Since confidentiality cannot be assured when using the Internet or email, transmission of confidential or proprietary information is discouraged unless appropriate precautions are used.

• The Company’s Anti-Harassment policy applies fully to the use of all Company Communications Systems and Company Equipment, including but not limited to, Internet, MSG<GO>, IB<GO>, BLOG<GO>, CHAT<GO> and email. Accordingly, acquisition and/or dissemination of inappropriate materials including, but not limited to, those which contain sexual innuendo, pornographic material, improper jokes, harassing or threatening statements, or any statement which could be negatively perceived by others or considered hostile or offensive based on any protected classification including, but not limited to, sex, race, color, age, religion, ancestry, marital status, national origin, sexual orientation, gender identity, genetic predisposition or carrier status, or disability, is strictly prohibited.

• No abusive, profane or offensive language or defamatory statements are to be transmitted through Company Communications Systems or Company Equipment. Attempts to circumvent Company safeguards in this regard are also prohibited.
• Solicitation of non-Company business or any use of Company Communications Systems or Company Equipment for non-Company business or personal gain is prohibited.

• Employees should not share their passwords or review other employees' files without permission.

• Visiting any game or entertainment sites (e.g., online gambling sites, music download sites, video-streaming sites, sexually explicit sites, social networking sites, personal blogs, etc.) for non-business reasons using Company Communications Systems or Company Equipment is prohibited.

• The sending of "chain letters" or "broadcast" messages to lists of individuals using Company Communications Systems or Company Equipment, or any other use of Company Communications Systems or Company Equipment that may cause congestion of the network, is prohibited.

• All messages transmitted on the Internet and via email using Company Communications Systems or Company Equipment should have your name attached and no messages should be transmitted under an assumed name.

• Employees should be aware that emails, as well as all other communications made using Company Communications Systems or Company Equipment, are Company records and can be used as evidence in a court of law. As described in more detail in BMAL<GO>, Bloomberg retains copies of all emails and other electronic communications transmitted over its Company Communications Systems and Company Equipment. Do not send communications by email which you would not send via written memo. Also, employees must show good judgment in choosing their personal MSG<GO> greeting comments.

• Employees’ use of the Internet is a privilege which may be revoked at any time.

• Employees must comply with policies requiring particular means of authentication to access the Bloomberg terminal and other Company Equipment.

Telephone Monitoring

In order to ensure compliance with Company policies and applicable laws and regulations, to maintain the safety and security of employees, customers, vendors, visitors, data and facilities and for legitimate business purposes Bloomberg reserves the right, whether on its own or through its third-party security contractors, to monitor all telephone conversations of its employees (including voicemail messages left for or by such employees) using Company Communications Systems, at any time with or without notice, and in accordance with applicable laws and regulations.

Closed Circuit Television (CCTV) Systems

In accordance with applicable laws, CCTV cameras are installed in some Company offices for safety and security purposes. Where CCTV cameras are installed, Bloomberg provides notice to employees and visitors. Footage is accessed and reviewed by Bloomberg’s risk management team and/or its third-party security contractors, and retention periods for the footage vary in accordance with local laws and regulations. CCTV footage may be shared with and/or transferred to the Company or Group Company offices or third party security contractors; such sharing may include transfers of personal data to countries other than the country in which the employee is based (including to the United States), which may have different levels of privacy protections.
Protection of Published Materials

Bloomberg subscribes to newspapers, journals, magazines, newsletters and other services in order to access business information. It is our policy to protect the rights of the publishers and/or authors of such media by paying for all subscriptions, unless they are provided free of charge. Moreover, employees may not copy, fax, print or redistribute this information except as legally permitted by the publisher and/or author, whomever has rights to distribution.

Personal Property

Bloomberg does not assume responsibility or reimburse employees or others for the loss, theft, or destruction of any personal property that is brought onto Company premises. Employees are urged to exercise care in regard to leaving their personal belongings on Company premises.

Property Inspection

Bloomberg and our security representatives reserve the right to inspect all storage areas, lockers, desks, briefcases, handbags, and other personal property brought onto or removed from the premises at any time. Employees must cooperate in such inspections should they occur.

Bloomberg does not accept the delivery of personal mail at any of our premises, unless otherwise pre-approved by the Company.

Security

Bloomberg’s premises contain valuable equipment, furnishings and merchandise. It is extremely important, in order to protect the safety of everyone, that all employees pay close attention to the security of our facility. Please notify Security and/or Professional Development immediately if you see anyone or anything suspicious. Employees must wear their identification badges (with their picture showing) in the office at all times, and swipe their badges upon entering and leaving Bloomberg premises.

Health and Safety

Bloomberg promotes maintaining a safe and healthy environment at the workplace. Employees should make themselves familiar with Bloomberg’s fire, medical and security procedures found on EMER<GO> to ensure that they know what to do in the event of an emergency.

6. Employee Services

Employee Assistance Program

Today’s lifestyles are increasingly hectic. All of us, regardless of our backgrounds or jobs, face a variety of difficulties in our daily lives. Most often, we are able to work situations out by ourselves. However, at times, many people may face problems that are too complex or overwhelming to handle alone.

While it is not Bloomberg’s intention to become involved in the personal lives of its employees, Bloomberg recognizes the importance of providing constructive professional assistance to help employees and their families work through difficult problems, put such problems in perspective and find reasonable solutions. Accordingly, Bloomberg offers an Employee Assistance Program (EAP) for its employees.
The EAP is a confidential program, available to all Bloomberg employees and their families, which provides individuals with an opportunity to discuss and resolve their difficulties with the assistance of experienced, licensed, and certified mental health professionals.

Please contact Professional Development or see EAP<GO> for more details on this program.

**Out of Office System**

All employees must use the OUT<GO> function on the terminal. Such function allows employees to record their approved days out of the office and serves as an attendance record. In addition, the OUT<GO> function is linked to employees’ FON<GO> records and comments on MSG<GO>. This function is beneficial to use, as it enables us to better serve our clients. Employees must receive approval from their managers prior to scheduling absences in OUT<GO>.

7. **Employee Benefits**

Bloomberg provides comprehensive and generous benefits to our employees globally. Please see HR<GO>, consult your contract, where applicable, or speak to Professional Development for details on the range of benefits offered by Bloomberg.

**Tuition Reimbursement**

Bloomberg provides tuition reimbursement to full-time employees for certain pre-approved, job-related courses. Please see BU<GO> 6<GO> for full details on the Tuition Reimbursement Policy.

In the event the employee leaves the Company within 12 months of completing a course(s) or certification exam for which tuition reimbursement was received, the employee is obligated to pay back 100% of all tuition reimbursement received for that course(s) or certification exam. Failure to repay the amount due may result in legal action taken by the Company against the employee.
EMPLOYEE CONSENT

I acknowledge that I have received a copy of the Global Resource and Information Core Guide ("Guide") for Bloomberg L.P. and its subsidiaries (referred to herein as "Bloomberg" or the “Company”). I also acknowledge that the terms of this Guide may be superseded by any applicable laws, as well as by my contract of employment and/or offer letter. I hereby acknowledge that I have read the Guide and will abide by its contents as a condition of my employment. If there is anything that I do not understand or have a question about, I will contact my manager or Professional Development. I understand that Bloomberg reserves the right to alter, amend or terminate, in whole or in part, any of the policies described in this Guide, or to modify or deviate from them, at any time without notice, and in Bloomberg’s sole discretion, as permitted by applicable law, and that the most up-to-date Guide is available under HR<GO> or IDOC<GO> on the Bloomberg terminal. I understand that this Guide is neither an employment contract nor an agreement guaranteeing employment and/or the provision of benefits for any specified period of time and that, absent an executed employment contract that says otherwise, either I or Bloomberg can terminate the at-will employment relationship at any time, for any reason.

By signing below, I further acknowledge that I have carefully read the provision titled “Personal Data and Information” under Section 3 and “Security, Facilities and Equipment” under Section 5, and that I give my express consent to Bloomberg L.P. to collect, process, use, store and disclose my Personal Data and Information, both electronically and in secure personnel files, as described in the Guide, and to access, inspect, review, monitor, copy, remove, change or disclose my communications made using Company Equipment or Company Communications Systems, at any time and without notice, as permitted by applicable laws.

I also give my express consent to the transfer of my Personal Data and Information and/or my communications to Bloomberg offices or third parties located outside the country in which I am based, including to the United States, and/or to other countries that may have different levels of privacy protection than my country for the purposes set out in this Guide.

Signature  (Please Print Name)

Date  Office