



# THE SUSTAIN- ABILITY EDGE

SUSTAINABILITY REPORT 2010

**Bloomberg**

**“THE ORIGINAL MANDATE OF OUR SUSTAINABILITY EFFORTS WAS TO a) BE A GOOD CORPORATE CITIZEN b) EDUCATE OUR COLLEAGUES SO THAT THEY CAN BE GOOD CITIZENS c) FIND THE BUSINESS VALUE: REDUCED OPERATING COSTS AND INCREASED REVENUE THROUGH PRODUCT INNOVATION.” –PETER GRAUER, CHAIRMAN, BLOOMBERG, L.P.**

**OUR APPROACH TO SUSTAINABILITY IS COMPREHENSIVE.**

It combines corporate citizenship, risk management and strategic opportunity – driving operating costs down, revenue growth up and greater adoption of sustainable practices.

Bloomberg’s commitment to the environment and the communities in which we work extends beyond our own doors – we also engage vendors and customers in setting standards, promoting clean technologies and reducing natural resource use.

Most importantly, we are leveraging our product and reach to integrate material environmental, human and other information into business and financial market analysis.

# Bloomberg

## “THERE IS A CLEAR CONNECTION BETWEEN TRANSPARENCY AND UNDERSTANDING OF OUR INTERNAL SUSTAINABILITY. AMONG BLP EMPLOYEES, AN INDICATOR OF OUR SUSTAINABILITY IS AMONG BLP CAN HAVE A BROAD IMPACT THROUGH OUR PRODUCTS.” –MELINDA WOOD, CHIEF PROFESSIONAL DEVELOPMENT OFFICER

### Products & Services

- CLEAN ENERGY FINANCE
- CARBON MARKETS
- ENVIRONMENTAL, SOCIAL & GOVERNANCE
- SUSTAINABILITY NEWS
- ENVIRONMENTAL LAW

RESPONSIBLE FORESTRY  
MANAGEMENT

GREEN BUILDING & ENERGY  
EFFICIENCY

SUPPLY CHAIN RISK

### Environment

ELECTRONICS EFFICIENCY  
& E-WASTE

ENVIRONMENTAL  
STANDARDS & TRANSPARENCY

## SUSTAINABILITY IS INTEGRATED INTO OUR BUSINESS

AT BLOOMBERG SUSTAINABILITY MEANS MANAGING OUR BUSINESS BETTER BY INTEGRATING ENVIRONMENTAL, SOCIAL AND ECONOMIC CONSIDERATIONS INTO OUR OPERATIONS AND PRODUCTS AND SERVICES.

SUSTAINABILITY IS A NATURAL FIT! –ERANA STENNETT, CORPORATE

PHILANTHROPY “THERE IS NO PARTY BETTER POSITIONED THAN WE ARE

TO HAVE AN IMPACT ON SUSTAINABILITY. WE WILL BE ‘INSIDIOUS,’ IN A

POSITIVE SENSE, ON INFORMATION TRANSPARENCY THAT WILL PLAY

A BIG ROLE IN MOVING THE MARKET.” –DOCTOROFF, PRESIDENT,

BLOOMBERG, L.P. “IF EVER THERE WAS A COMPANY CULTURALLY POSI-

TIONED TO GRASP AND RUN WITH SUSTAINABILITY, IT’S BLOOMBERG.

THE OPERATIONAL BENEFITS AND TRANSPARENCY HELP US DRIVE THIS

THROUGHOUT THE FIRM.” –JACK DAVIS, GLOBAL SUPPLY CHAIN MANAGEMENT

### Social

PHILANTHROPIC SUPPORT

COMMUNITY INVESTMENT

EMPLOYEE ENGAGEMENT

HEALTH, SAFETY & WELLNESS

INCLUSION & DIVERSITY

# Bloomberg

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# SCOPE OF REPORT

Welcome to Bloomberg's first comprehensive sustainability report. This document describes our approach to, and performance on, material environmental, social, and governance issues during the year ending December 31, 2010.

It provides information and data covering Bloomberg's global operations, including all joint ventures, subsidiaries, and leased facilities.

Bloomberg L.P. is a privately held Limited Partnership. In common with other privately held companies, we do not publicly disclose detailed financial information.

This report was prepared using the Global Reporting Initiative (GRI) G3 Guidelines and has been assessed as application level B+. When calculating global carbon emissions, Bloomberg includes all components of the Company within its financial boundaries. Bloomberg L.P. (BLP) has calculated its Carbon Emissions with guidance from 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). Our carbon emissions are third-party assured by Cventure.

For more information on our sustainability programs visit **<http://www.bloomberg.com/bsustainable>**

We welcome your comments and suggestions on any aspect of our sustainability programs, performance and reporting. Contact the Sustainability Group at **[BSustainable@Bloomberg.net](mailto:BSustainable@Bloomberg.net)**

For more information on our sustainability programs, visit **[bloomberg.com/bsustainable](http://www.bloomberg.com/bsustainable)**

# ABOUT BLOOMBERG

Bloomberg is the world's most trusted source of information for financial professionals and businesses.

Bloomberg combines innovative technology with unmatched analytics, data, news, display and distribution capabilities, to deliver critical information via the Bloomberg Professional<sup>®</sup> service and multimedia platforms, including Bloomberg Businessweek and Bloomberg Markets<sup>®</sup> magazines. Bloomberg's media properties span television, radio, digital and print, making up one of the world's largest news organizations. Headquartered in New York, the company employs more than 12,900 people in 184 locations around the world.

Bloomberg's guiding principles:  
**CLARITY. TRANSPARENCY.  
EMPOWERMENT. INNOVATION.**

## **PRODUCTS AND SERVICES**

The foundation of Bloomberg's leadership is the ability to take large amounts of disparate data and news and transform it into actionable useful insights. Bloomberg Government, Bloomberg Law, Bloomberg Sports and Bloomberg New Energy Finance are just a few of the offerings that provide opportunities to capitalize on Bloomberg's data management and delivery expertise.

Bloomberg Tradebook is a leading global agency broker used by institutional traders, broker-dealers, hedge fund managers, market-makers and portfolio managers worldwide.

Bloomberg News and Media platforms provide real-time news and definitive coverage of companies, markets, industries, economies, governments and much more. Bloomberg's media properties span television, radio, digital and print and make up one of the world's largest news organizations with more than 2,300 news and multimedia professionals at 146 bureaus in 72 countries. For more information, please visit [www.bloomberg.com/solutions](http://www.bloomberg.com/solutions)

## **CORPORATE GOVERNANCE**

Bloomberg L.P. is a privately held Delaware USA Limited Partnership. The Board of Directors provides strategic direction to the Company, with representatives from corporate divisions reporting to the Chairman of the Board and representatives from Product & Services reporting directly to the President. There are 11 members of the Board; five are non-executives, of which three are independent, including one woman.

The Chairman of the Board, Peter Grauer, and the President, Dan Doctoroff, are the highest-ranking officers and serve in these roles at the request of the owner.

**2010 BLOOMBERG PROFESSIONAL** MORE THAN 300,000 SUBSCRIBERS / **BLOOMBERG NEWS** PRODUCES, ON AVERAGE, 5,000 STORIES A DAY. THE BLOOMBERG NEWS SERVICE IS PICKED UP BY MORE THAN 420 PUBLICATIONS IN 65 COUNTRIES / **BLOOMBERG MARKETS** 355,000 CIRCULATION / **BLOOMBERG BUSINESSWEEK** 4.6 MILLION READERS / **BLOOMBERG BUSINESSWEEK.COM** 9.4 MILLION UNIQUE VISITORS PER MONTH / **BLOOMBERG.COM** 10.6 MILLION UNIQUE VISITORS PER MONTH / **BLOOMBERG TELEVISION** AVAILABLE IN MORE THAN 250 MILLION HOMES / **BLOOMBERG RADIO** BROADCAST NATIONALLY VIA SIRIUS/XM RADIO AND ON WBBR 1130AM IN THE NEW YORK AREA. REPORTS AND PROGRAMS ARE SYNDICATED TO 200 RADIO AFFILIATES IN THE U.S. / **BLOOMBERG MOBILE** INDUSTRY-LEADING APPLICATIONS ARE AVAILABLE ON THE IPAD, IPHONE, BLACKBERRY AND NOKIA DEVICES AND HAVE BEEN DOWNLOADED MORE THAN 6 MILLION TIMES.

**7,735**  
USA & CANADA

**1,761**  
ASIA PACIFIC

**236**  
CENTRAL &  
SOUTH AMERICA

**2,958**  
EUROPE, MIDDLE EAST  
& AFRICA

NUMBER OF EMPLOYEES (YEAR END 2010)

**12,690**

NUMBER OF FACILITIES

**184**

NUMBER OF COUNTRIES  
WHERE WE HAVE OFFICES

**73**

ANNUAL REVENUE

**\$6.9  
BILLION**



# MESSAGE FROM PETER GRAUER

CHAIRMAN

## Sustainability is central to Bloomberg's core values and provides competitive advantage.

Michael Bloomberg founded our business on one core belief – that bringing transparency to capital markets through access to information could increase capital flows, produce economic growth and jobs, and significantly reduce the cost of doing business. Today, we continue to build on that foundation in everything that we do. We provide decision makers in business, finance and government with a vast network of information to enable them to make more effective and informed decisions.

Historically, we have not extended the same principle of transparency to our business operations. We are a privately held company. However, in the five years since we began actively integrating a sustainability strategy into our business plan, we've discovered a lot about the value sustainability can add. We feel it is our obligation to the business community and the communities in which we operate to share this information.

A common misconception holds that integrating sustainability into corporate strategy brings additional cost without quantitative value. At Bloomberg, we couldn't disagree more. Our sustainability initiative has evolved into an employee and community engagement platform, an effective management tool and a substantial source of innovation and opportunity.

We invest significant time and money in the communities in which we live and work. We've saved over \$25 million in the last three years by reducing our environmental impact. And we've developed new sustainability products and services for our customers. These are tangible benefits to the Company.

Our inaugural report outlines our efforts in philanthropy, environmental management, health and wellness, and learning, leadership and diversity. These initiatives drive value to our business in multiple ways – improving productivity, managing risk, reducing costs and driving product development. We recognize that for sustainability to become fully integrated into corporate strategy, there needs to be a direct value to companies and capital markets. Our report provides a glimpse of the direct value that accrues to Bloomberg's business; we hope it will assist others in finding a similar value for their businesses.

It is not only important for companies to develop sustainability strategies, but also to report on their results. Disclosure, transparency and access to information are critical drivers of shared knowledge surrounding sustainability. As members of the global business community, it is our responsibility to ensure this information is made available – and to elevate the conversation.

Stay tuned. We've only just started.



# MESSAGE FROM DAN DOCTOROFF

PRESIDENT

## Integrating sustainability into business strategy and financial markets delivers real value.

A growing collective of NGOs, governments, communities, individuals and companies around the globe now see an opportunity to develop a more targeted and innovative approach to sustainability.

Climate change is the biggest driver of today's sustainability debate. While focus on carbon emissions will likely have the largest impact, we need to look at the risks to ecosystems that climate change creates – including water scarcity, and loss of forests and biodiversity. These ecosystems provide indispensable services to the planet, society and the economy, and, by extension, to businesses.

How to truly prosper in the transition to a low-carbon economy and how capital markets evaluate and reward those actions are challenges we face today. Each firm needs to determine how to leverage its core expertise to create opportunity while propelling change.

Financial professionals look to Bloomberg for critical market information. We see our company as a platform that can help emerging environmental markets and analysis gain acceptance among the investor community by providing actionable information such as news, data, and analytical tools.

Bloomberg believes that market-based mechanisms are essential to combat climate change. We view our role not

only as an advocate but also as a catalyst for our customers to accelerate investment in solutions.

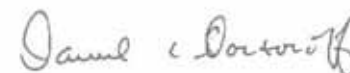
This is the beginning of what we expect to be a long-term growth area. Bloomberg is well positioned to provide credible, actionable sustainability analysis.

We've reviewed Bloomberg's offerings and made significant enhancements to news coverage, equities analysis, and environmental markets products. And Bloomberg's new products in energy, law and government address sustainability policy and regulatory issues for their targeted community of users.

As a fundamental platform for financial professionals and businesses, Bloomberg works hard to understand customers' workflow. Thus we are well positioned to integrate useful sustainability data and analysis into the valuation and decision-making process of the capital markets.

By bringing transparency to the marketplace, Bloomberg can provide clarity about new and often complex instruments and issues. This builds confidence in the public market and drives liquidity and broader participation. Ultimately, Bloomberg's goal is to provide valuable and timely information, which drives responsible investment decisions along the value chain.

Bloomberg can develop new standards, financial instruments and markets by collaborating with business, finance, NGOs, and governments. Our approach is intended to be comprehensive, combining corporate citizenship, risk management, and strategic opportunity with driving operating costs down, revenue growth up, ultimately encouraging the adoption of greater sustainability as a core focus for the Company and our customers.



# MATERIAL ISSUES

This report focuses on sustainability issues material to Bloomberg's business.

**We identify these issues by:**

- Analyzing our business activity for environmental and social impact
- Reviewing specific concerns identified by stakeholders through our engagement process
- Benchmarking issues covered in the reporting of peer companies and sustainability leaders across sectors and regions
- Using the Global Reporting Initiatives G3 Guidelines to frame our approach to reporting

**The issues below were identified as most material to the company based on this process:**

- Accuracy of our information services
- Accuracy, balance and impartiality of our news reporting
- Ability of our products and services to raise awareness about sustainability issues
- Operating activities' contribution to climate change and impact on ecosystem services
- Ability to attract and retain top talent
- Ability to continue to innovate
- Ability to remain competitive
- Ability to provide superior customer service and support

**Key challenges remain:**

- Creating standards for sustainability data
- Integrating meaningful data, news and analysis about sustainability across all products and services
- Expanding base of customers we serve with sustainability information
- More effectively aligning our environmental and social investment strategies
- Reducing emissions from our data centers
- Addressing continued growth in employee travel
- Implementing an aggressive and comprehensive global program

Two of our key challenges are to  
**REDUCE CARBON EMISSIONS FROM  
DATA CENTERS AND TRAVEL.**

# PRIMARY INDICATORS

	UNIT OF MEASURE	2010	2009	2008	% CHANGE	REFERENCE	DEFINITION
<b>KEY BUSINESS FACTORS</b>							
Revenue	\$ billions	6.9	6.3	6.1	12%	Page 8	Operating revenues less various adjustments to Gross Sales.
Employees	Number (#)	12,690	10,990	10,317	23%	Page 67	Number of full-time employees at the end of the reporting period as disclosed in the company's social responsibility reports.
Occupancy	SqFt	3,211,000	3,021,585	2,898,868	11%	Page 35	Leased and owned square footage in the company's real estate portfolio.
Electricity	kWh	241,669,809	231,668,327	239,108,901	1%	Page 34	Kilowatt hours consumed by the company in the reporting year including common area charges.
Travel Miles	Man-miles	111,267,818	83,433,977	77,756,534	43%	Page 36	Business miles traveled by company employees in the reporting period.
<b>PRODUCTS &amp; SERVICES</b>							
BNEF	# of organizations (thousands)	38	28	22	73%	Page 21	Number of global organizations (in thousands) active in clean energy in Bloomberg New Energy Finance's database.
ESG	# of companies (thousands)	4.1	3.6	3.0	37%	Page 22	Number of publicly traded companies (in thousands) in Bloomberg's database reporting environmental, social and governance data.
NEWS	# of awards	20	9	14	43%	Page 24	Number of news stories from multiple Bloomberg platforms receiving awards for environmental and social coverage.
BLAW	# of analyses	154	145	110	40%	Page 23	Number of Bloomberg Law analyst written and contributed articles published in the Sustainability Law Report.
New Products – Climate Change	Yes/No	Yes	Yes	Yes	n/a	Page 20	New climate change related products introduced by Bloomberg – Integrated Carbon Disclosure Project data in 2008, Environmental, Social and Governance data in 2009 and New Energy Finance in 2010.
<b>ENVIRONMENTAL</b>							
Emissions/Revenue	Metric tonnes	28.14	22.34	24.27	16%	Page 32	Total firm CO <sub>2</sub> e emissions, including acquisitions, divided by million dollars of revenue. Excluding acquisitions, the 3 year % change is (11%).
RECs/Purchased Electricity	% kWh	60	56	48	25%	Page 34	Amount of Renewable Energy Credits purchased by the company as a percentage of total electricity consumed.
Travel Emissions/Employee	Metric tonnes	2.66	2.37	2.33	14%	Page 36	Emissions resulting from miles traveled per employee.
Water/Employee	Gallons	6,414	6,544	6,560	(2%)	Page 43	Gallons of water consumed on a per employee basis annually. This is an estimated number.
Landfill/Employee	Metric tonnes	0.15	0.18	0.21	(29%)	Page 39	Metric tonnes of CO <sub>2</sub> e generated by the company on a per employee basis.
Investments/Revenue	\$	522	578	258	102%	Page 37	Dollars spent on Sustainability related projects, per million dollars of revenue.
Third Party Verification	Yes/No	Yes	Yes	Yes	n/a	Appendix xvi	Indicates whether the company's environmental policies were subject to an independent assessment for the reporting period.
Green Building Policy	Yes/No	Yes	Yes	Yes	n/a	Page 35	Indicates whether the company has a policy regarding its efforts to use environmentally friendly procedures in the design and construction of its buildings.
Environmental Supply Chain Management	Yes/No	Yes	Yes	Yes	n/a	Page 51	Indicates whether the company has a policy to address environmental supply chain management.



PRIMARY INDICATORS	UNIT OF MEASURE	2010	2009	2008	% CHANGE	REFERENCE	DEFINITION
<b>SOCIAL</b>							
Lost Time From Accidents/ Employee	# of incidents	0.14	0.15	0.21	(35%)	Page 73	Total number of incidents resulting in lost time from work, normalized on a per employee basis.
Total Training Hours/Employee	# of hours	55	40	31	78%	Page 69	Average number of training hours on a per employee basis.
Community Spending > 1% PTP	Yes/No	Yes	Yes	Yes	n/a	Page 62	Indicates whether the amount of money spent by the company on community-building activities is greater than 1% of pre-tax profit.
Health & Safety Policy	Yes/No	Yes	Yes	Yes	n/a	Page 70	Indicates whether the company has a policy regarding employee health and safety in the workplace.
Fair Remuneration Policy	Yes/No	Yes	Yes	Yes	n/a	Page 74	Indicates whether the company has established a consolidated firm-wide policy regarding fairness in compensation of employees.
Equal Opportunity Policy	Yes/No	Yes	Yes	Yes	n/a	Page 75	Indicates whether the company has a policy to hire and promote on merit.
Human Rights Policy	Yes/No	Yes	Yes	Yes	n/a	Page 18	Indicates whether the company has a policy to protect the rights of all people with whom it works.
<b>GOVERNANCE</b>							
Size of the Board	# of directors	11	11	11	n/a	Page 6	Number of directors on the company's board.
Independent Directors	%	27	27	27	n/a	Page 6	Percentage of board members that can be classified as independent. Independent board members are not employees of the company, have not received a large sum of direct compensation from the company and are not directly related to any of the company's executives.
Women on Board	%	9	9	9	n/a	Page 6	Percentage of women on the Board of Directors.
Board Meetings	# of meetings	4	4	3	33%	No ref.	Number of corporate board meetings held in the past year.
Board Meeting Attendance	%	98	89	88	11%	No ref.	Percentage of members in attendance at board meetings during the period.
Political Donations	\$	0	0	0	n/a	No ref.	Amount of corporate donations to political groups, parties or individuals.
CEO Duality	Yes/No	No	No	No	n/a	Page 6	Indicates whether the company's Chief Executive Officer is also the Chairman of the Board.
Sustainability-Linked Compensation	Yes/No	Yes	Yes	Yes	n/a	Page 14	Indicates whether executive compensation is linked to Environmental, Social and Governance (ESG) goals.
UN Global Compact Signatory	Yes/No	Yes	No	No	n/a	Page 18	Indicates whether the company is a signatory of the United Nations Global Compact.
UN PRI Signatory	Yes/No	Yes	No	No	n/a	Page 20	Indicates whether the company is a signatory of the United Nations Principles for Responsible Investment.
GRI Application Level	Grade	B+	n/a	n/a	n/a	Page 5	Indicates whether the company is in compliance with the Global Reporting Initiative (GRI) criteria and what application level is targeted.

# SUSTAINABILITY GOVERNANCE

Sustainability embodies the core values that have made Bloomberg one of the world's most successful companies.

Sustainability at Bloomberg is managed directly by three primary groups – Environmental Sustainability, Professional Development and Philanthropy. All report directly to the Chairman of the Board.

This Sustainability Group reviews policies and procedures on sustainability issues to ensure compliance with all relevant internationally-accepted principles and best practices. They also coordinate engagement with external stakeholders.

The Group works with 21 operating departments to raise awareness and coordinate efforts to reduce Bloomberg's environmental impact. Since 2007, they have initiated more than 300 sustainability projects across the business with the guidance of a steering committee of senior managers.

Managers and team members in high-environmental-impact departments have specific sustainability goals and metrics that are tied to their annual compensation.

Ethics and employment issues are handled by our Professional Development department, a global presence of more than 175 professionals who ensure that Bloomberg is providing a competitive package of benefits to our employees and their dependants. They also assure that our leadership

and diversity programs are properly designed to meet our employee needs in the many countries and cultures in which we work.

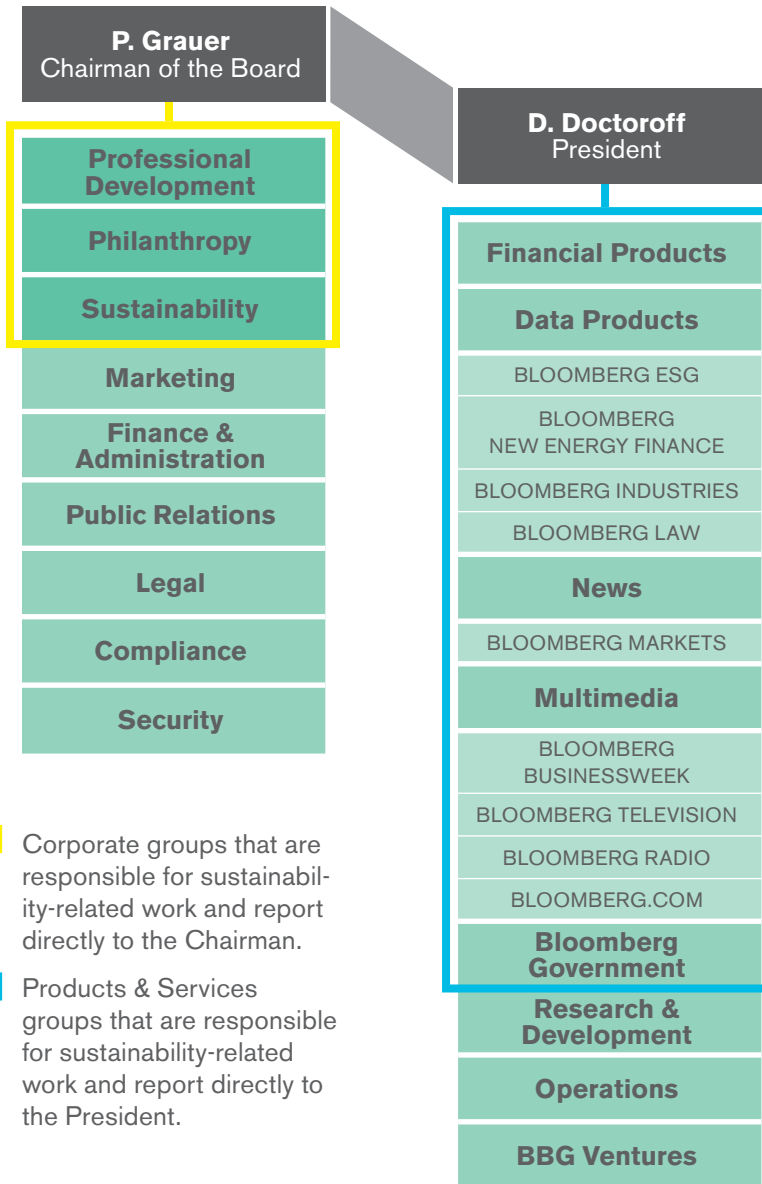
Our Philanthropy Group has 14 individuals spread over four major regions in which we operate – North America, Latin America, Europe, Middle East and Africa (EMEA) and Asia Pacific. They ensure that our corporate giving program is in line with our core tenets and the wishes of our major shareholder.

Sustainability-related product development is managed by multiple product groups, reporting to the President.

A working group of representatives from Equities, Commodities, Law, Government, Industries, News, Multimedia and others is lead jointly by senior staff from the President's Office and the Sustainability Group. They review the Company's products and services and evaluate opportunities within the greater sustainability information space.

Bloomberg's sustainability efforts are guided by our core belief that environmental and social issues are material to our business and our partners – customers, vendors, employees, owners, nonprofits, governments and communities. The Company has developed specific policies and guidelines to ensure that we integrate these issues into our tactical and strategic considerations.

## ORGANIZATIONAL STRUCTURE



- Corporate groups that are responsible for sustainability-related work and report directly to the Chairman.
- Products & Services groups that are responsible for sustainability-related work and report directly to the President.

## BLOOMBERG SUSTAINABILITY INTERNAL STRUCTURE & STRATEGY



### Chairman's Initiative

Sustainability-related corporate groups report directly to the Chairman and related product groups report to the President.

### Strategic Relevance

Integrated into core business units with specific goals/targets and accountability.

### Operational Integration

Performance metrics established and tracked by Sustainability Group.

### Aggressive Targets

Overall target of 50% footprint reduction by 2013, with interim, specific departmental targets designed to get us there.

### Assurance

Annual Carbon Emissions Verification since 2007.

### Stakeholder Engagement

Aggressive and detailed communication strategy targeting internal and external constituents.

# STAKEHOLDER ENGAGEMENT

## Material issues are best identified with the help of partners.

We do this as part of normal business practice as well as more formally through a multi-stakeholder initiative with Ceres ([www.ceres.org](http://www.ceres.org)). The views of the Ceres stakeholder panel have been taken into account in the development of this report.

Below we list Bloomberg's key stakeholders and outline how the Company engages with these groups. More information on our partners is available throughout this report.

**Communities** Through Bloomberg's philanthropic programs, we engage with the communities around the 63 offices in which we have 10 or more employees. Our support is focused on education and literacy programs, health and medical research, social work, arts and culture, public parks and the environment.

**Customers** Bloomberg conducts regular satisfaction surveys to understand the needs of our customers. These include a comprehensive annual survey of all our Bloomberg Professional® service customers. This annual survey is supplemented with data from other studies conducted by business units, which are done more often and focus on specific market segments.

**NGOs** Bloomberg collaborates with NGOs that are aligned with our core business operating issues and our corporate philosophy. These include NGOs involved in: setting environmental standards and promoting transparency; management of supply chain risk.

**Suppliers** We engage with our suppliers via an extensive Vendor Survey to help ensure we conduct business only with companies that meet high labor and environmental standards. We then provide feedback to help low-scoring suppliers improve their performance.

**Employees** We communicate with our employees using a number of channels to keep them up-to-date about business and sustainability efforts.

**Governments** Governments and financial centers around the world depend on the Bloomberg Professional® service for insight into financial markets and increased transparency that fosters global liquidity.



## Stakeholder Engagement Within the Report

In August 2010, we met with 13 stakeholders in Bloomberg's New York office at a session organized and chaired by Ceres\*. The meeting's objectives were to obtain:

- Stakeholder views on Bloomberg's sustainability plans, priorities and disclosures
- Detailed feedback on a draft of this report

Present in the meeting were senior executives who manage Bloomberg's sustainability, human resource, and corporate-giving efforts. ESG Product Managers guided stakeholders through its functions and showed them how investors access the information.

Peter Grauer, Bloomberg's Chairman, who was traveling at the time, joined the meeting by teleconference. He described the thinking behind Bloomberg's sustainability strategy and fielded questions. The stakeholders supported the development of ESG products and the company's sustainability and philanthropic efforts. They challenged Bloomberg to do more in the areas of reducing energy use in data centers, increasing the coverage of ESG issues in its news and information services, and persuading lawmakers to promote sustainability.

Our learning from the meeting, as well as detailed written comments from Ceres, have informed this report's development.



\*Ceres is a national network of investors, environmental groups and other public interest organizations working with companies to address sustainability challenges such as global climate change. Bloomberg is a member of the Ceres network of companies, which means that the company has committed to work with Ceres on various aspects of its sustainability performance and disclosure. Being a Ceres company is not a certification or stamp of approval relating to the company's business.

### HIGHLIGHTS OF STAKEHOLDER FEEDBACK

**Private company:** Leadership as a private company in stakeholder engagement, transparency and sustainability is critical. Sharing business rationale for its sustainability efforts and explaining how its private company structure influenced its strategy are important.

**ESG product:** Bloomberg's ESG product is a "game changer." Focus on closing the data gap and broadening the audience. Produce supporting metrics on usage, growing number of companies reporting.

**Educating customers:** Bloomberg has a responsibility to educate its customers about how sustainability impacts their business. Find opportunities through products/media business to link data and day-to-day stories, and the increasing risks, impacts and costs of sustainability issues over the long term.

**ROI for sustainability:** Demonstrate cost savings and revenue opportunities of efforts. Powerful message internally and could catalyze broader change. Use the report to demonstrate type and quality of information to populate the ESG product.

**Public policy:** Play a more active role in sustainability public policy, especially on transparency and disclosure issues.

**Integrating social issues:** Integrate more social issues into ESG product and overall mandate, linking with the work done by Philanthropy and Professional Development.

**Diversity:** Think about diversity broadly and develop strategy with regard to employees, business partners, suppliers, allocations, journalism, ESG product, etc.

**Compensation:** Stakeholders appreciated the linkage between manager compensation and delivery of sustainability projects and are looking for more detail.

**Operations:** Set long-term measurable goals on sustainability performance. Data centers and business travel are key challenges.

**Supply chain:** Align with robust third-party programs (e.g., eStewards, Green Screen) to address impacts from electronics. Open source tools developed to address supply chain sustainability (e.g., the ESG scorecard, the Engineering Product Guidelines) to help other organizations.

# HUMAN RIGHTS/ETHICS & BUSINESS STANDARDS

Human rights are most relevant to Bloomberg in relation to our employees and suppliers.

## **EMPLOYEES**

We work hard to protect the human rights of our employees by providing equal opportunities and a safe and inclusive workplace. Bloomberg complies with all applicable laws and regulations on forced and child labor, as well as the rights of employees to unionize in the workplace.

All employees receive mandatory training about harassment and cultural sensitivity. Employees can take additional courses relating to equal employment opportunity issues through Bloomberg University, our online training portal.

The Bloomberg General Standards of Conduct and Ethical Behavior set out the standards we expect our employees to follow. It requires our people 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.

The full text of the policy is provided in the human resources section on our intranet, HR<GO>.

The policy provides clear channels for raising concerns internally. Employees can also raise concerns, ask questions or report misconduct using a hotline that is available 24 hours a day, 7 days a week.

The numbers for the hotline are:

+1-212-617-1595 ((801)1595) or

+1-800-777-7217 (toll free in the U.S.)

All calls are confidential and employees can choose to remain anonymous.

We receive very few complaints on the hotline, and the types of issues raised typically include standard employment-related concerns that are investigated and resolved internally.

## **SUPPLIERS**

We want to work with suppliers that meet high labor standards and protect human rights. Contracts with suppliers contain ethical behavior clauses. In addition, we conduct social responsibility audits of our equipment manufacturers to assess labor standards. To supplement these efforts, Bloomberg is a signatory of the United Nations Global Compact.

# SUSTAINABLE PRODUCTS & SERVICES

The image is a composite graphic. The left side is dominated by a blue-tinted photograph of an office workstation with several computer monitors. The right side shows a blurred, black and white image of a person sitting at a desk, looking at a computer screen. A white text box is overlaid on the left side, containing the text 'SUSTAINABLE PRODUCTS & SERVICES' in a bold, sans-serif font.

# SUSTAINABLE PRODUCTS & SERVICES

Our **PRODUCTS AND SERVICES** provide essential information to the world's most influential audiences. Increasing transparency around sustainability issues – both risks and opportunities – encourages responsible investment decisions and development practices.

**BLOOMBERG** is the world's most trusted source of information for financial professionals and businesses.

Bloomberg combines innovative technology with unmatched analytics, data, news, display and distribution capabilities, to deliver critical information via the Bloomberg Professional® service and multimedia platforms, including Bloomberg Businessweek and Bloomberg Markets® magazines. Bloomberg's media properties span television, radio, digital and print, making up one of the world's largest news organizations. Headquartered in New York, the company employs more than 12,900 people in 184 locations around the world.

We are a signatory of the United Nations Principles for Responsible Investment and are convinced that sustainability presents a material market opportunity for Bloomberg. There is a growing need among our customers for data, news, analytics and insight into how sustainability impacts business, society, policy, technology and financial markets.

## **CHALLENGES**

Sustainability issues have not been integrated into standard investment analysis, business operations (risk) or product development (opportunities) by the financial and business communities. While Bloomberg considers its efforts to be at the forefront, significant work lies ahead. It is a relatively new set of issues

for the firm and its customers and, accordingly, requires improved internal education, training and additional resources. These needs will continue to compete with other business priorities. We are, however, committed to accelerating development efforts, leading the financial community toward full adoption, and are prepared for a long-term investment.

While we recognize that we still have a long way to go, we outline here how we are seizing these opportunities by introducing innovative products and services across multiple Bloomberg business units.

# LEADING MARKETS TO SUSTAINABILITY

## Bloomberg seeks to make sustainability information actionable for investors and businesses.

Although environmental and social factors increasingly create enormous market opportunities and risks for business, “sustainability” remains a nebulous and undefined variable limited by a frustrating lack of clear information. Bloomberg is in a unique position to address that challenge by making relevant sustainability data rigorous and actionable.

With unmatched market intelligence capabilities, we provide sophisticated, credible sustainability information that offers greater market transparency to our clients.

With our access to influential professionals around the globe and range of product offerings, we can integrate environmental and social knowledge throughout the business landscape.

Information is power, and transparency can advance sustainability and transform the marketplace. That is why Bloomberg provides key decision makers with a critical advantage by making sustainability relevant, revealing hidden financial opportunities and risks. Business owners and executives will see market data through a new lens, with more granularity and breadth than ever before and ultimately make smarter decisions for their business and the world.

### **BLOOMBERG ESG**

Bloomberg Environmental, Social and Governance (ESG) data are integrated into the Bloomberg Equities service and collected from published company material. Bloomberg has researched 20,000 of the most actively-traded public companies. We have obtained ESG data disclosed by 4,100 companies in 52 countries.

ESG data on the Bloomberg Terminal are fully integrated with all of Bloomberg’s cutting-edge analytics, such as the Equity Screener (EQS) and Relative Value (RV). In addition, we have developed ratios and key performance indicators to better compare and analyze companies on ESG metrics.

We believe that the service supports the growth of sustainable and responsible investment by offering a straightforward way to access comprehensive, quality ESG information at no extra cost to our subscribers. And, through relationships with major non-governmental and not-for-profit organizations, we are collaborating to increase the number of companies disclosing ESG data and to improve the quantity and quality of that information.

### **BLOOMBERG NEW ENERGY FINANCE**

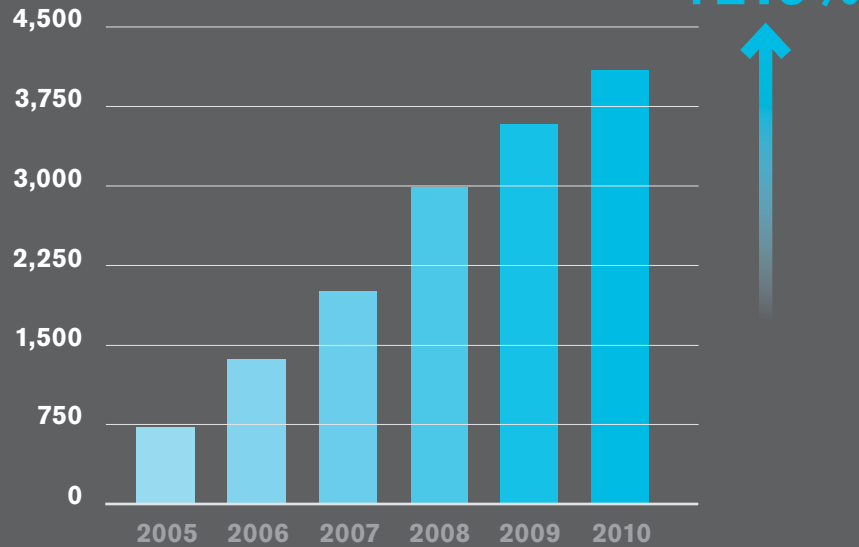
<http://bnef.com>

Bloomberg New Energy Finance (BNEF) is the leading provider of analysis and information on clean energy, low-carbon technologies and the carbon markets to investors, corporations, and governments. BNEF sector specialists operate across all areas of clean energy and low-carbon technology, including wind, solar, biofuels, biomass, energy efficiency, nuclear, and carbon capture and storage. The Carbon Markets division generates industry-leading analysis, price forecasting, consultancy and risk management.

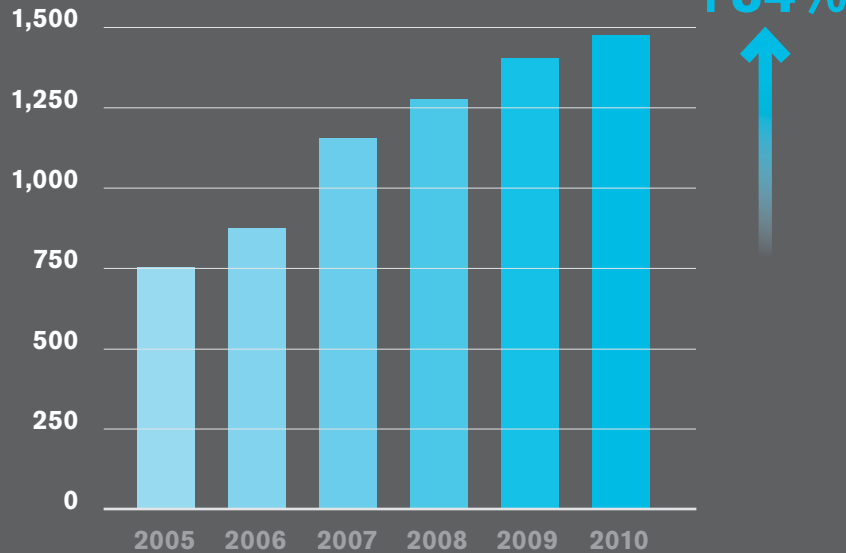
**ESG: COMPANIES & FUNDS ACTIVITY**

Significant growth in both the number of firms disclosing ESG as well as the greater number of funds listed in the environmental and socially responsible category on the terminal further supports the trend.

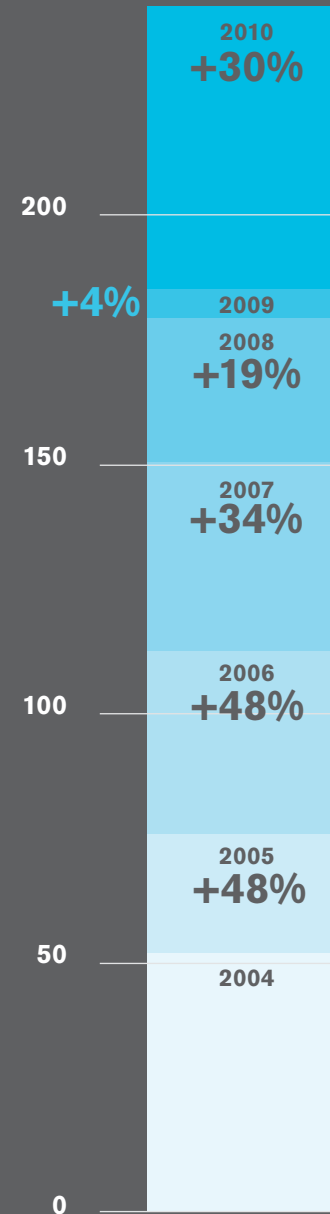
**COMPANIES REPORTING ESG**



**SRI/ESG-RELATED FUNDS**



\$ billions  
250



**GLOBAL TOTAL NEW INVESTMENT IN CLEAN ENERGY**

Total investments in clean energy surged by more than \$50 billion in 2010, driven by activity in China, offshore wind, European rooftop photovoltaics, and R&D spending by companies and governments.

Corporations, financial institutions, governments and service providers make use of a wide array of subscription-based services that include news, investment data, research, advisory services and executive events. We are proud to serve several leading global institutions, including the Clinton Global Initiative, World Economic Forum, Renewable Energy Finance Forum, International Energy Agency and the Prince's Rainforest Agency.

**BLOOMBERG INDUSTRIES**

Bloomberg Industries combines the insight of a team of experienced analysts with comprehensive and proprietary data. This platform provides a new modularized, dynamic approach to industry analysis, improving both the efficiency and productivity of traditional research. Our goal is to provide clients with a complete view of an industry and its key constituents to help them make faster and better investment decisions across the capital structure. We serve the research needs of a wide variety of constituents, including the investment community, corporations and consultants. Deep Clean energy sector research is supplemented with cross-sector fundamental ESG indicators at the industry and company level as well as key BNEF clean energy and carbon factors for impacted sectors.

**BLOOMBERG GOVERNMENT**

<http://www.bgov.com>

Bloomberg Government is a customizable resource for professionals (congressional staffers, government affairs professionals, sales executives, C-suite executives, etc.) who need to understand the business implications of government actions. BGOV collects best-in-class data, providing high-end analysis and analytic tools and reporting (proprietary and aggregated) from multimedia specialists worldwide. We cover key industry sectors (including health care, energy, defense, infrastructure, finance and tech/telecom) and crosscutting areas such as trade, taxation, labor and environment. Understanding the nexus of energy, the environment and related policy and regulation is critical for executives as these issues continue to grow in importance.

**BLOOMBERG LAW**

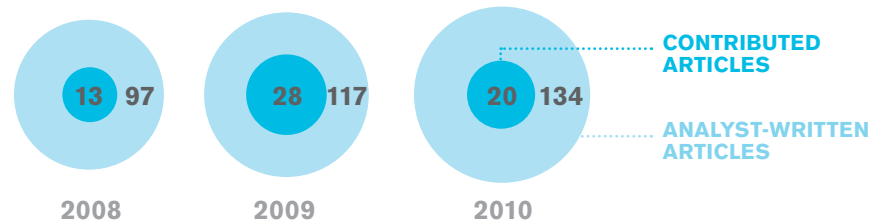
<http://www.bloomberglaw.com>

Bloomberg Law® (BLAW) is a real-time legal research system that integrates innovative search technology, legal content, company and client information, and proprietary news. Our comprehensive database includes case law, dockets, legislative and regulatory materials, current awareness and more.

BLAW offers dedicated resources for energy law practitioners, including quick access to relevant primary source materials, targeted searches utilizing key energy law databases, and secondary resources for important energy law reference information. BLAW also publishes the Sustainable Energy Law Report (ELLR), a monthly current awareness reporter covering legal developments in areas such as alternative fuels, clean energy technologies, climate change, energy efficiency, and renewable energy. The ELLR regularly features contributions from leading energy law practitioners, which provide additional depth and perspective on key issues affecting sustainable energy law.

**BLOOMBERG LAW**

Number of Sustainability Reports Published



**BLOOMBERG GOVERNMENT**

Energy & Environment Regulation

2010 DEPARTMENT	FINAL RULES	NOTICES
EPA	478	1,023
Department of Energy	39	2,237

# TRUSTED INFORMATION & NEWS

## Bloomberg News began operations in 1990 with a team of six people.

Twenty years later, we are one of the world's largest news organizations and media companies – and the definitive source for the professional investor. Today, we employ more than 2,300 professionals in 146 bureaus around the world. Bloomberg News publishes more than 5,000 original articles on an average day, and we syndicate to more than 340 newspapers (64 million circulation) and 427 publications (75 million circulation) worldwide.

Through our news services, magazines, and book publishing, we keep millions of people informed about current affairs, including social and environmental issues; in the past 3 years, Bloomberg news has won 43 journalism awards related to its coverage in these areas. Each day our customers make vital business decisions using the information, news, and analysis that Bloomberg provides. This makes it essential that we maintain the highest standards of accuracy and neutrality.

## Five Fs: **FACTUAL WORD, FIRST WORD, FASTEST WORD, FINAL WORD & FUTURE WORD.**

Bloomberg reporters pride themselves on their journalistic integrity. All Bloomberg journalists must abide by a detailed handbook, The Bloomberg Way. The handbook stresses the principles of accuracy, critical thinking, depth, guidance, people and global relevance. These principles are defined by the Five Fs – Factual Word, First Word, Fastest Word, Final Word and Future Word – and are the operating ethos of the organization.

### **NEWS DISTRIBUTION**

Bloomberg News is primarily delivered through the Bloomberg Terminal. Subscribers have access to a comprehensive multimedia platform. In addition to the unique value Bloomberg News provides, Bloomberg® Multimedia allows users to view live broadcasts and interactive seminars and delve into Bloomberg's archive of 400,000 multimedia interviews and news events.

Dozens of live speeches, news conferences and seminars – including Federal Reserve events and meetings of most S&P 500 companies – are broadcast daily. Customers can see and hear news as it happens, no matter where they are in the world.

Speed and transparency are powerful tools available to Terminal users. We mine a wealth of information from more than 26,000 web resources and 3,000 blogs by employing our exclusive monitoring and search tools, providing tailored information that is relevant to each customer – delivered right to their screen. The Bloomberg Professional® service also maintains an archive of more than 15 million articles and multimedia reports. Our photo library has access to more than 290,000 images.



**BLOOMBERG MARKETS®**

<http://www.bloomberg.com/markets-magazine>

Markets is a monthly magazine that goes to more than 355,000 readers, providing regular coverage of energy, the environment and sustainability developments as they pertain to the global financial community. Virtually every month, Markets publishes at least one in-depth feature on energy-related topics, including: “New King Coal” and “Spanish Sunburn” (Nov. 2010); “River of Discord” (Dec. 2010). The Agenda section also devotes a page each month to news about Energy and the Environment.

Every May, the magazine publishes an annual special report on the Future of Energy. In addition to several feature stories, the package this year will include a ranking of the World’s Most Environmental Banks, which is based on environmental risk factors and low carbon investment activity.

**BLOOMBERG BUSINESSWEEK**

<http://www.businessweek.com/>

The magazine was founded in 1929 and is a market leader, with more than 4.6 million readers each week in 140 countries. Redesigned in 2010, the new Bloomberg Businessweek magazine features expanded content, 20 percent more editorial pages, new sections and completely retooled and enhanced navigation. Drawing on 1,700 journalists in 146 bureaus across 72 countries, Bloomberg Businessweek seeks to moderate global conversations through content, context and collaboration.

Bloomberg Businessweek has made sustainability one of its key coverage themes, not simply with regular special reports such as “Focus on Climate Change,” “Focus on Energy,” and “Focus on Green Business,” but by integrating the issue into every aspect of its thinking and reporting. The magazine’s reportage and analysis explores the business case for sustainability and separates hype from reality. We closely follow the public policy debate both in Washington and the states, explain the rise of China as a dominant market for and producer of wind, solar and other technologies, and explain to our readers the impact of breakthrough developments from mass-produced electric vehicles to hydrogen fuel cells to cellulosic ethanol. Our sustainability coverage is not siloed. It is knitted into the fabric of everything we do.

**BLOOMBERG TELEVISION**

<http://www.bloomberg.com/tv/>

Reaching more than 245 million homes worldwide, Bloomberg Television is based on the power of Bloomberg News and delivers timely, accurate and concise business coverage, together with unbiased context and insights. Our access to global markets, business leaders and financial information allows us to identify critical news and related events.

Bloomberg TV covers global sustainability and clean energy with a unique lens, providing insight and analysis into emerging technologies, policies, and trends. BTV also does in-depth reporting on the major sustainability issues of our time through a business lens, from climate policy on Capitol Hill to the emergence of electric cars in Detroit, from carbon markets in Europe to smart cities in Abu Dhabi to solar power in China.

Bloomberg has access to the key players, regularly interviewing influencers like U.S. Energy Secretary Steven Chu, Virgin Group CEO Richard Branson, and Duke Energy CEO Jim Rogers. We also take the time to feature emerging innovators and technologies in areas such as offshore wind power and rural microfinance across the globe.

**BLOOMBERG RADIO**

<http://www.bloomberg.com/radio/>

Bloomberg Radio is broadcast via Sirius XM Radio and WorldSpace satellite radio globally and on WBBR 1130 AM in the New York/New Jersey/Connecticut area. Bloomberg Radio reports and programs are syndicated to 200 radio affiliates nationally.

The Bloomberg Radio Green Report is a daily 60-second feature exploring the latest developments in green technology. Washington-based reporter Jon Bascom profiles companies making breakthroughs in renewable energy, conservation, recycling, zero-emission transportation and waste disposal. From long-life batteries to light-emitting diodes to sustainable agriculture, the Bloomberg Radio Green Report offers news on cutting-edge technology that is shaping the future of the 21st century. The Bloomberg Green report can be heard weekdays at 6:20 a.m. on WBBR in New York and at various times across the country on Bloomberg-affiliated stations.



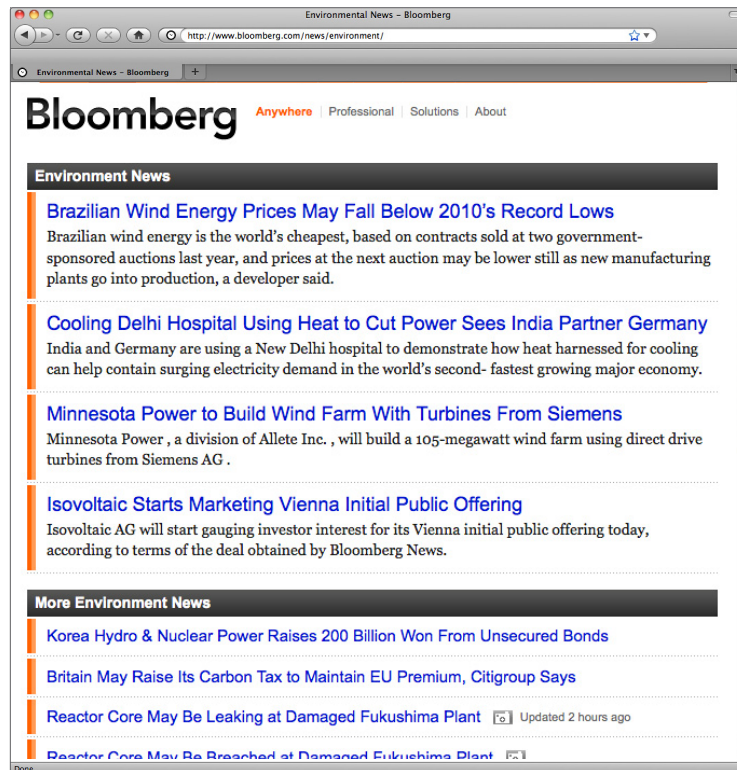
**BLOOMBERG BUSINESSWEEK** has made sustainability one of its key coverage themes, integrating the issue into every aspect of its thinking and reporting.

**BLOOMBERG.COM**

http://www.bloomberg.com/

Bloomberg.com and Businessweek.com combined reach more than 17 million individuals each month, providing business executives around the world the news, data and information they need to make decisions and lead the conversation in their industries. Bloomberg.com carried 1,976 stories on clean energy and environmental issues in 2010. Businessweek.com will launch a sustainability news and information section in 2011 to create new content and enhance existing assets.

**BLOOMBERG.COM ENVIRONMENTAL COVERAGE**



**BLOOMBERG NEWS' WOMEN'S INITIATIVE**



**BLOOMBERG NEWS' Women's Initiative** began in June 2010 to examine and expand our coverage of women in the global economy. So far, we have expanded our source lists and added more opinion pieces by women. We have also spurred reporters from around the world to get to know women leaders in the companies and governments they cover. That has resulted in multiple feature stories and continues to be a focus in 2011.

# ENVIRO- NMENTAL OPERATIONS



# ENVIRONMENTAL OPERATIONS

Through our environmental strategy, we are analyzing every aspect of our business with the goal of creating a sustainable Bloomberg.

Our most significant operational environmental issue are the climate change impacts of our office energy use, employee travel and product transport. Other environmental impacts include waste, paper consumption and water use.

In addition to benefiting the environment, our strategy helps us reduce costs, encourage innovation and make our people feel proud to work for Bloomberg. It also gives us credibility as we expand our range of products that are enabling the shift to a low-carbon economy.

## **BGREEN**

Bloomberg has internally branded its sustainability effort “BGREEN,” an environmental initiative that promotes our overall sustainability strategy and encompasses all activities related to our environmental efforts, from education and engagement opportunities to operational reductions from our business activities.

## **ENVIRONMENTAL MANAGEMENT**

The four-person Bloomberg sustainability team is based in New York and reports to the Chairman’s office. The team coordinates environmental activities, monitors performance and collaborates with a network of BGREEN regional leads and 21 operating departments to reduce environmental impacts across the Company. It also provides guidance to managers responsible for implementing environmental initiatives and works with them to set improvement targets and strategies for meeting goals.

During business planning, the sustainability team works with different operating groups to identify environmental improvement projects. Once approved, projects are tracked and the percentage of projects satisfactorily completed during the calendar year is used as a metric to determine compensation and bonus levels for the managers responsible. Managers in

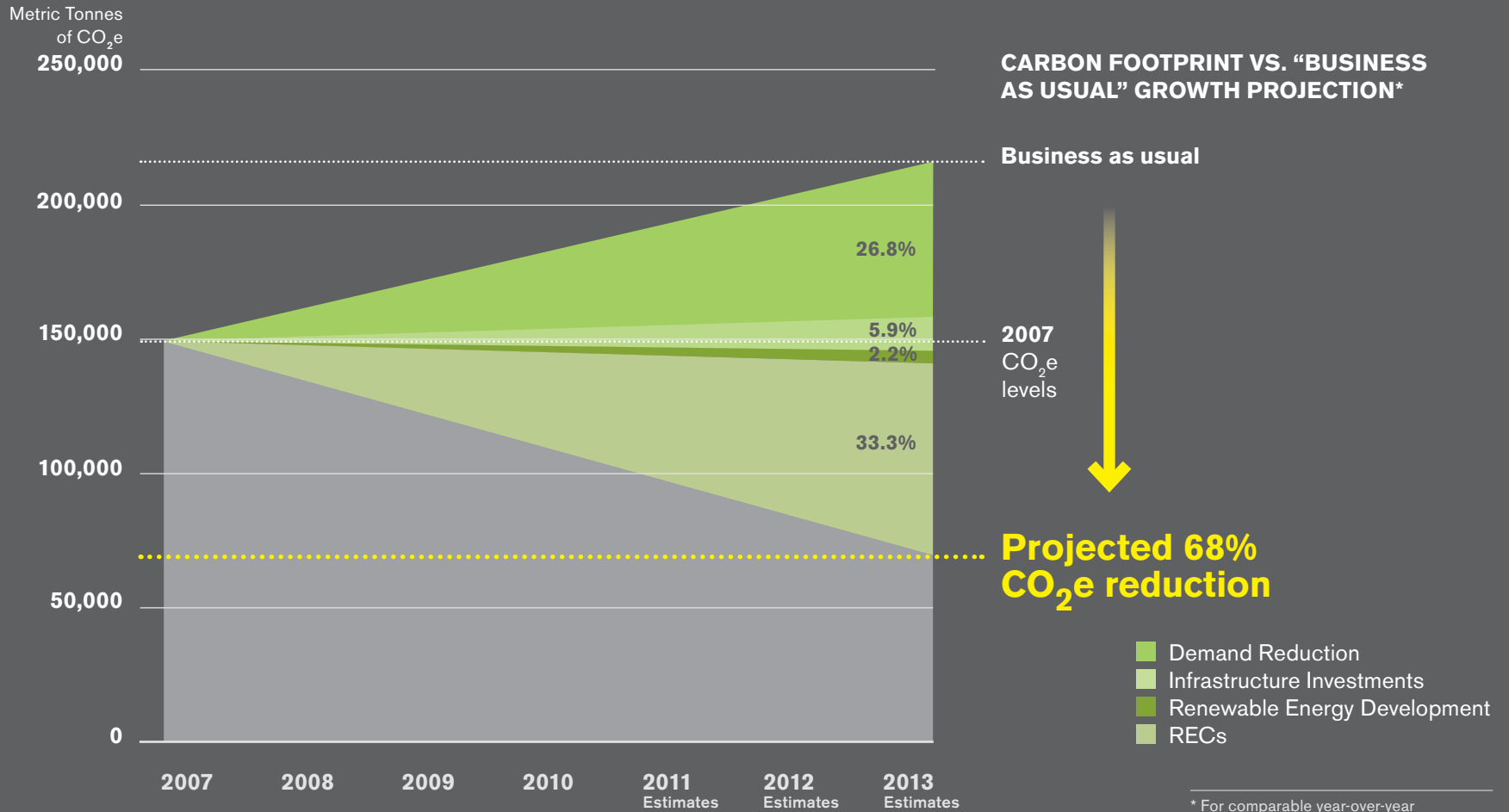
departments with the biggest impacts have the largest stake tied to their performance.

In 2009, we rolled out green operating policies for cleaning, construction, and waste management across Bloomberg, and we introduced a scorecard at key offices globally to promote environmental improvement programs.

In 2010, we automated much of our data collection processes to improve internal environmental reporting. Our goal in 2011 is to provide carbon emission scorecards for upper management and key department managers to monitor progress against our climate change goals.

**BLOOMBERG WILL REDUCE ITS CARBON FOOTPRINT BY 50% BY 2013 FROM 2007 LEVELS THROUGH IMPROVING ENERGY EFFICIENCY, USING RENEWABLE ENERGY AND AGGRESSIVE WASTE REDUCTION STRATEGIES.**

We are engaging our employees, vendors and customers in setting standards, promoting clean technologies and improving natural resource utilization.



\* For comparable year-over-year performance, this excludes emissions from recent acquisitions.

# ENERGY & EMISSIONS

## Bloomberg depends on technology to provide cutting-edge news and information services to our customers.

Nearly 70% of our total core<sup>1</sup> greenhouse gas emissions result from energy use. The next largest contributor is employee business travel and product transport (logistics), which jointly contribute 25% of total emissions. The balance of our emissions is a result of paper consumption and waste.

To achieve our goal (reduce CO<sub>2</sub>e<sup>2</sup> footprint by 50% by 2013, from 2007 levels) we are:

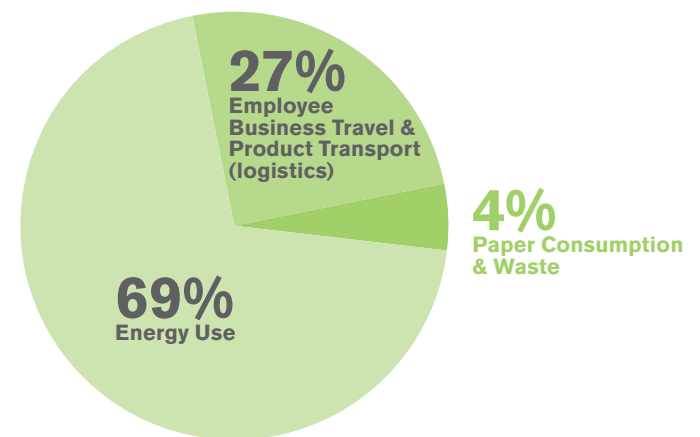
- Making our buildings and IT equipment more energy efficient
- Looking for opportunities to generate renewable energy on-site
- Reducing the impact of employee business travel and product transport
- Reducing CO<sub>2</sub>e emissions from waste
- Using green electricity by purchasing Renewable Energy Credits

Our carbon emissions data are third-party assured by Cventure. In 2010, Bloomberg participated in the Carbon Disclosure Project Supply Chain initiative for the third time at the request of one of our customers, and we were recognized as a leader with a score of 79. This places us in the top 10% of both Financial Services and Information Technology sectors, the two sectors most applicable to Bloomberg.

In 2010, BLP Core absolute CO<sub>2</sub>e emissions were 145,914 metric tonnes, down 2.4% vs. 2007 emissions.

Core emissions normalized by revenue decreased by 20.4% against our 2007 baseline. We achieved these reductions primarily by increasing the energy efficiency of our buildings and IT equipment.

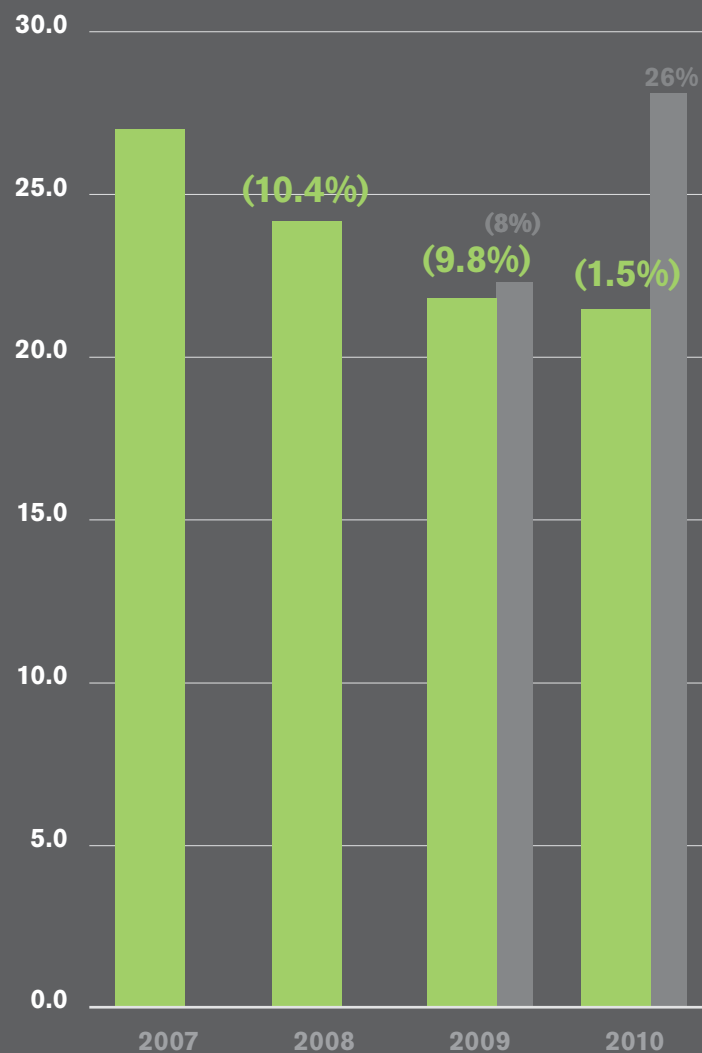
### CARBON EMISSIONS BY ACTIVITY



1. BLP Core emissions exclude emissions from recent acquisitions for comparable year-over-year performance.  
2. CO<sub>2</sub> equivalent (CO<sub>2</sub>e) measures the combined impact on climate change of multiple greenhouse gases. Emissions of each gas are converted to an amount of CO<sub>2</sub> that would cause the same climate change impact and summed.

**CORE CO<sub>2</sub>e\***

Metric Tonnes CO<sub>2</sub>e per \$M Revenue



\*For comparable year-over-year performance, this excludes emissions from recent acquisitions.

\*For comparable year-over-year performance, this includes emissions from recent acquisitions.

**BLOOMBERG CARBON FOOTPRINT**

Metric Tonnes CO<sub>2</sub>e

	2010	2009	2008	2007	% Change CO <sub>2</sub> e/ Customer Terminals 2010 vs. 2007 <sup>3</sup>
<b>Scope 1</b>					
Direct Combustion Emissions <sup>4</sup>	5,961	4,864	4,671	2,619	107.6%
<b>Scope 2</b>					
Indirect Combustion (Electricity, Steam)	96,883	94,179	101,850	102,524	(13.8%)
<b>Scope 3</b>					
Employee Business Travel	29,865	23,971	22,101	22,055	23.5%
Material Transport	2,029	2,646	5,850	7,857	(75.6%)
Markets Magazine Distribution	3,696	3,547	3,794	3,783	(10.9%)
Paper Consumption	5,650	5,340	7,948	8,452	(40.9%)
Landfill Waste	2,006	2,118	2,357	2,479	(26.2%)
<b>BLP Core Emissions</b>	<b>145,914</b>	<b>136,665</b>	<b>148,570</b>	<b>149,499</b>	<b>(11.0%)</b>
Emissions from 2009 Acquisitions <sup>5</sup>	47,663	3,041	n/a	n/a	-
<b>Emissions Subtotal</b>	<b>193,577</b>	<b>139,705</b>	<b>148,570</b>	<b>149,499</b>	<b>18.1%</b>
REC Purchases	(59,900)	(52,821)	(47,723)	(48,086)	13.6%
<b>BLP Carbon Footprint</b>	<b>133,677</b>	<b>86,884</b>	<b>100,847</b>	<b>101,413</b>	<b>20.3%</b>

3. BLP Core Emissions divided by number of customer Bloomberg Professional® subscriptions.

4. Includes emissions from use of natural gas, oil, refrigerants, and aircraft fuel.

5. Businessweek and NEF acquired December 2009.



Separately, in December 2009, Bloomberg made two acquisitions, Businessweek magazine and New Energy Finance (NEF). The full-year impact of these acquisitions in 2010 was substantial, totaling 47,663 metric tonnes, equal to 32.7% of Bloomberg Core Emissions. Information on the changes to Businessweek can be found below in the Magazine Publishing section.

**DATA CENTER CHALLENGES**

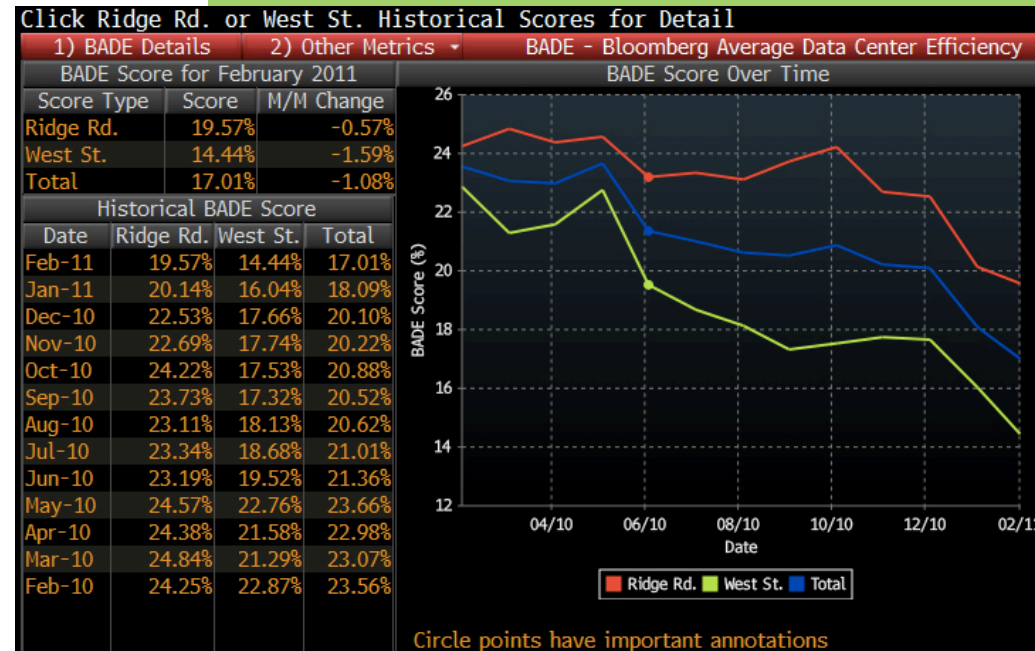
Our data centers – the engines that power the large volume of information available on our Terminals – are our most important assets and largest user of power. Our economic interest is served by reducing power consumption. The amount of data we store, the complex calculations performed and high level of customer service that we provide create constantly increasing computing requirements and consequently more energy use. This is a sector-wide challenge.

To evaluate our Data Centers, we created the Bloomberg Average Data Center Efficiency (BADE) analysis tool. This is accessible on our internal Terminals so that our managers and data center operators can target efficiency improvements. BADE contains data on a wide variety of factors that influence energy consumption. BADE compiles and averages data related to individual server memory and utilization, overall building power utilization, IT power utilization and other relevant metrics to arrive at a monthly overall efficiency score for our data centers.

In 2010, we held a summit for data center managers to discuss ways to reduce their operations' energy consumption. A 2011 goal was set to establish and communicate targets for each aspect of our data center operations.

Data center efficiency is a priority for Bloomberg L.P. Bloomberg has implemented and is aggressively pursuing creative solutions to save energy at our data centers, e.g., heat mapping, thermal energy storage, cogeneration, variable frequency drives, free cooling, hot/cold aisle configurations, etc. However, given the critical role data centers play in our business, our appetite for aggressive change is constrained as we cannot risk any disruptions to our customers.

**BADE SNAPSHOT**



This is a snapshot of BADE from February 24, 2011. The main driver for the decline in the 2010 numbers is the expansion of our NY location and additional generators at our NJ campus. This caused the total capacity (maximum kilowatts we can draw from the grid while still maintaining redundancy) to increase in both locations. In NY, we also added to the UPS capacity. Since these assets are not yet fully utilized, these projects drove the Facilities Utilization downward, decreasing the overall BADE score.

**BUILDINGS AND IT**

We are working to reduce the energy we use in our 184 offices, data centers and warehouses around the world.

Between 2008 and 2010, energy efficiency projects in our buildings included:

- Conducting energy audits in 731 Lexington and 340 West St. (New York), Skillman and Ridge Road (New Jersey), and our Hong Kong office (collectively representing 67.5% of global energy consumption) to identify opportunities for energy savings.
- Turning off the lights during nonworking hours, saving approximately 7 million kWh annually.
- Installing more efficient lighting.
- Installing motion sensors to match lighting with occupancy.
- Adjusting controls on heating, ventilation and air conditioning.
- Installing power monitoring in our London broadcast studio.

IT energy efficiency projects included:

- Setting monitors to sleep mode, conserving approximately 10 million kWh annually.
- Upgrading more than 9,100 PCs to more efficient models certified to the EPEAT and Energy Star 4.0 standard. EPEAT is a system defining environmental criteria for computers and monitors.
- Piloted a system at our New York office to put PCs in sleep mode when unused. Software will be implemented globally in 2011 – saving more than 3 million kWh annually when complete.
- Assessing the efficiency of our data centers using metrics relating to data center building operations and server utilization.
- At the end of 2010, about 6% of monitors in use conform to the U.S. EPA Energy Star energy efficiency standard.

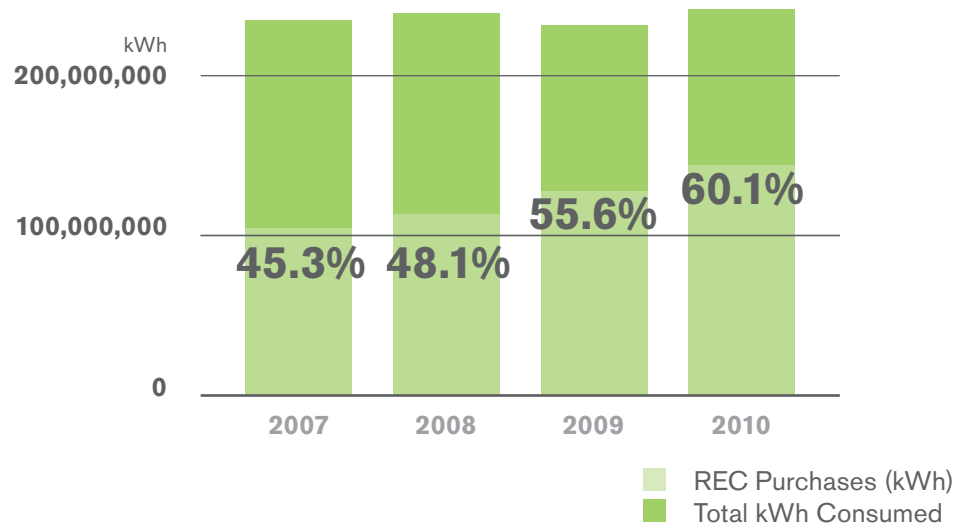
**RENEWABLE ENERGY**

We purchase Renewable Energy Credits (RECs) for our largest sites. While we view voluntary REC purchases as tertiary to our demand reduction and infrastructure investment efforts, they do send a demand signal and supplementary revenue to clean energy project developers and operators. Current demand is weak, driving down prices and limiting impact. If more corporate consumers of electricity added RECs to their environmental strategy, improved demand and increased prices could accelerate investment. At the end of 2010, we were the 28th largest buyer of Green Power RECs in the United States according to the U.S. EPA Green Power Partnership ranking. In the U.K., we buy renewable energy directly from our provider.

In 2009, we assessed opportunities for using solar, geothermal and wind energy at key U.S. sites. In 2010, we began a project to install a 1.764 megawatt solar array at our Skillman campus in New Jersey. The system is expected to produce more than 2.8 million kWh annually, reducing our footprint by more than 1,400 metric tonnes and meeting approximately 41% of the site's energy needs.

**RENEWABLE ENERGY CREDIT (REC) PURCHASES IN KWH**

As % of Total Consumed kWh



## GREEN BUILDINGS

We include language in our preferred lease terms that sets out our requirements for landlords. These cover energy supply and monitoring, waste management and recycling, green cleaning, green construction, bike parking and water saving.

Our policy is for all new office developments, refurbishments and expansions to be certified or built to LEED (Leadership in Energy and Environmental Design) standards.

The primary challenge in building to LEED specification is the increased level of coordination and planning required. Attention must be paid to every detail to ensure that the majority of purchases are local, have high recycled content and meet indoor air quality specifications.

The design and construction of the following Bloomberg offices have been certified using LEED for commercial interiors:

- > **Our 38 Finsbury expansion in the London office is LEED Platinum for Commercial Interiors certified. It was built by reusing a high proportion of existing materials and using wood from sustainable sources where possible. The building has an array of energy-saving features.**
- > **Our San Francisco office is LEED Gold for Commercial Interiors certified. During construction, more than 40% of existing nonstructural components were reused. Water usage was reduced by 40% through the installation of low-flow fixtures. The building maximizes the use of natural light.**
- > **Our Tokyo offices were the first in Japan to receive LEED Gold for Commercial Interiors certification. The building was constructed using environmentally preferable materials, is powered by green energy and uses sensors to match lighting with occupancy.**
- > **Our Shanghai office was recently certified LEED Platinum for Commercial Interiors. This is Bloomberg's first office to be certified using LEED version 3.0. The HVAC equipment exceeds the highest LEED standard for energy efficiency. Daylighting and occupancy sensors are employed to control lighting power usage. Materials with low volatile organic compounds (VOCs) used throughout the office.**

We are seeking LEED Platinum or Gold for Commercial Interiors certification at ten additional locations.

## FACILITIES' LEED CERTIFICATION EFFORTS

Nearly half of our employees will sit in LEED Certified office space by 2012

Project	Certification	Progress	Sq Ft (approx.)	Desks
38 Finsbury Phase 1	Awarded LEED Platinum	Awarded November 2010	19,600	302
Tokyo 19th Floor	Awarded LEED Gold	Awarded October 2009	11,000	96
San Francisco – Pier 3	Awarded LEED Gold	Awarded November 2008	24,800	180
Shanghai Relocation	Awarded LEED Platinum	Awarded April 2011	10,900	56
Mumbai Relocation	Anticipated Gold	In progress. Design and construction credits to be submitted by early to mid-February 2011. We are currently tracking 72 points.	16,000	128
Hong Kong Expansion	Anticipated Gold (Possible Platinum)	In progress. Design credits submitted in December 2010. Construction credits to be submitted mid-February 2011. We anticipate certification by April. We are currently tracking 82 points.	13,400	170
London, 38 Finsbury Expansion, Floors 4-6	Anticipated Platinum	In progress. Project completed June of 2010. Design credits were submitted in July 2010. Construction credits to be submitted at the beginning of February 2011. We are currently tracking 89 points.	16,000	300
London, Park House	Anticipated Gold (Possible Platinum)	In progress. Design Credit submission anticipated in February 2011. Construction completion anticipated in May 2011. Tracking 84 points.	65,000	864
Dubai Relocation	Anticipated Gold (Possible Platinum)	In progress. Project completed October 2010. Design credits submitted 2010. Construction credits anticipated for submission by mid-January 2011. Anticipated certification by February 2011. Tracking 79 points + 3 potential points.	12,000	88
731 Upperstack Expansion	Anticipated Gold	In progress. Project completion anticipated end of January 2011. Design credits submitted in November 2010. Tracking 39 points (V2.0).	131,400	1,414
1101 K St. BGOV Relocation	Anticipated Gold	In progress. Project completion anticipated end of January 2011. Design credits submitted in November 2010. Tracking 64 points.	27,000	248
Skillman 101 Office Renovation	Anticipated Gold	In progress. Project completion anticipated end of July 2011. Checklist pending.	14,000	134
120 Park Ave., NYC	LEED Gold or Above	Project recently announced. Expected occupancy by year-end 2011.	400,000	2,500
<b>Total LEED Certified by YE 2011 (approx.)</b>			<b>716,100</b>	<b>6,480</b>
<b>Total Portfolio/Headcount (approx.)</b>			<b>3,211,000</b>	<b>14,000</b>
<b>Percentage of Total</b>			<b>22%</b>	<b>46%</b>

**PRODUCT TRANSPORT AND BUSINESS TRAVEL**

We are a global company with clients in 160 countries. In 2010, BLP Core emissions from employee business travel and transport of products were 34,599 metric tonnes, a 12.1% increase from 2007 levels. Normalized against revenue, an intensity reduction of 8.6% was realized in the time period.

**PRODUCT TRANSPORT**

In 2010, we shipped more than 420,000 products, which resulted in 2,029 metric tonnes of CO<sub>2</sub>e (compared with 7,587 metric tonnes in 2007). Close to ninety percent of these products (by weight) were transported by ground or sea, compared with 81% in 2007. In addition to increasing our percentage of lower carbon methods of transportation, Bloomberg has taken other actions to reduce emissions associated with customer freight. Some examples of these projects are:

- Transfer of customer-needed PC images electronically rather than traditional transportation.
- Reduction in the weight of our products and packaging. For example, the shipping weight of our keyboards has decreased by more than 5 lbs. since 2007 (4.4 lbs. from the weight of the actual product and 0.8 lbs. from the packaging of the product).

The packaging associated with the transport of our products generates 35% of our annual waste. Bloomberg has taken steps to reduce this waste by implementing reusable packaging and eliminating styrofoam from our waste stream. Bloomberg has recently begun testing packaging that is biodegradable and made from agricultural by-products.

**EMPLOYEE TRAVEL**

	AIR		RAIL		CAR		TOTALS		
	Miles	MT of CO <sub>2</sub> e	Miles	MT of CO <sub>2</sub> e	Miles	MT of CO <sub>2</sub> e	Miles	MT of CO <sub>2</sub> e	MT of CO <sub>2</sub> e/FT Emp.
<b>2010</b>	102,636,008	31,234.09	2,764,883	237.61	5,866,927	2,223.61	<b>111,267,818</b>	<b>33,695.31</b>	<b>2.66</b>
<b>2009</b>	76,364,999	23,915.13	1,833,468	157.57	5,235,510	1,981.67	<b>83,433,977</b>	<b>26,054.37</b>	<b>2.37</b>
<b>2008</b>	70,491,063	21,756.28	1,835,360	177.81	5,430,111	2,077.09	<b>77,756,534</b>	<b>24,011.18</b>	<b>2.33</b>
<b>2007</b>	69,560,294	20,927.24	1,028,606	99.65	5,797,006	2,247.00	<b>76,385,906</b>	<b>23,273.89</b>	<b>2.39</b>

**EMPLOYEE TRAVEL CHALLENGES**

Employee travel is a key component of our business model – our sales teams need to travel regularly to see clients and generate new business. Face-to-face customer support and training are often cited as a distinct advantage we have over our competitors. Accordingly, reducing emissions resulting from travel is a challenge. Air travel is our primary mode and, as we have added significant customer-facing headcount, our travel has been steadily increasing year-over-year.

We hope to address this challenge in the near future as telepresence technology matures. We encourage employees to take greener modes of transport when feasible. For example, on specific short-range, heavily travelled routes, we encourage the use of rail, which emits about 70% less CO<sub>2</sub> per mile than flying.

Performance highlights in 2010 include:

- 94% of travel between London and Paris/Brussels, and 58% of travel between New York City and Washington, was via rail.
- Use of car services was down 53% in the U.K. and 12% in the U.S. compared with 2007. This reduction was achieved by initially introducing shuttle-bus services from U.K. Bloomberg offices to airports and rail stations to limit car service usage (2008 – 2009), and then pushing public transport options, both in the U.K. and U.S., as a permanent car service alternative wherever feasible.

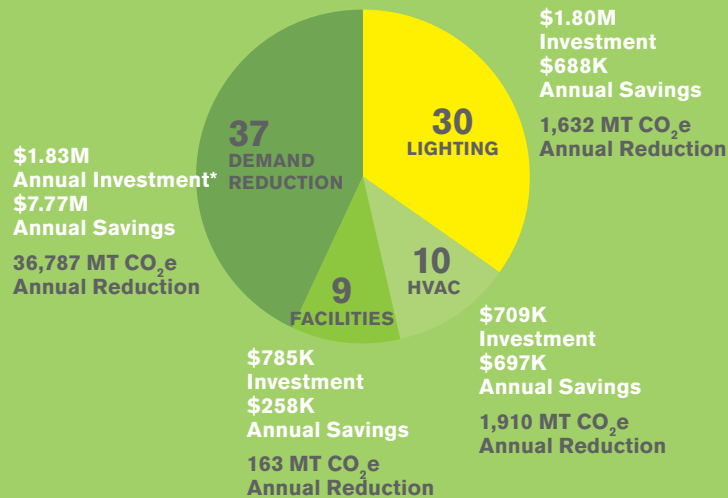
## Financial & Environmental Summary

For every \$1 invested in environmental management, we save \$2 in operating costs.

**BLOOMBERG** has aggressively utilized both Demand-Reduction and Capital Investment projects to mitigate the environmental impact of its operations. There is typically a high correlation between environmental reduction and financial return, especially with those projects that yield energy savings. We have invested nearly \$9 million in sustainability projects and will increase that materially in coming years to capture the associated financial and environmental benefits.

### KEY PROJECT SEGMENTS & ENVIRONMENTAL/FINANCIAL IMPACT

Chart Represents Number of Projects



\* Demand Reduction investment includes all Sustainability Operating expense, but tallies only projects specifically designed to reduce carbon impact of our operations

### CASE STUDY: NYC YEAR-OVER-YEAR KWH REDUCTION FROM CAPITAL PROJECTS

Five capital projects, costing approximately \$700k, implemented at our New York City office in 2009 reduced our electricity consumption by 1.44 million kWh and save the firm \$300,000 annually.

#### LIGHTING/CONTROLS CAPITAL PROJECTS AT 731 LEXINGTON OFFICE IN 2009 & IMPACT

Reduction in kWh

Of the 5 projects, 3 lighting projects evaluated substantially the same way. Bulb/Fixture Change – identify kWh savings from product specification of old bulb/fixture vs. new bulb/fixture and applicable duration of impact (hours on vs. hours off).

2 are Control projects – Lighting & Fan Box. Specification of kWh consumption of equipment within area of controls and assessment of downtime equipment will realize with implementation of controls.

91,258	LIGHTING LL2 BACK OFFICE
490,500	LIGHTING 731 CONTROLS
627,127	LIGHTING COVE & CORE
86,339	LIGHTING RECESSED HALOGENS
141,667	FAN POWER BOX
<b>1,436,891</b>	<b>TOTAL KWH REDUCTION</b>

# WASTE & RECYCLING

We work hard to reduce waste and to increase recycling and composting. Sending waste to landfill is a last resort.

## WASTE REDUCTION

When biodegradable waste is sent to landfill, it rots and produces methane, a powerful greenhouse gas. 1.1% of our emissions, 2,067 metric tonnes, relate to landfill waste. We calculate CO<sub>2</sub>e emissions from waste using the methodology and conversion factors<sup>6</sup> provided by the U.S. Environmental Protection Agency.

Bloomberg has composting programs in place in **FIVE DIFFERENT LOCATIONS.** And counting...

The main types of waste produced by Bloomberg are:

**General Office Waste** Mostly paper and cardboard, ink and toner cartridges, cans, and plastic containers

**Electronic Equipment Waste from our offices and returns from customers** Redundant PCs, monitors, servers, broadcast equipment, mobile phones

**In-house Printing Waste** Paper, ink and press-cleaning liquid

**Pantry Waste** Food waste, cans, plastic and glass containers, cutlery and bowls made from biodegradable material

We have placed recycling bins for paper, cans and plastic in all our offices and pantries. The default setting on our printers is double-sided, which helps reduce paper use.

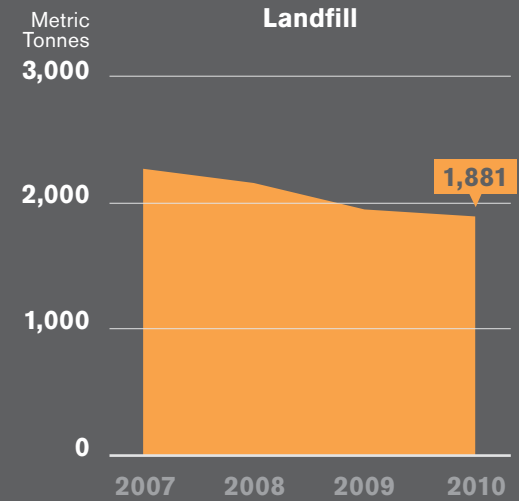
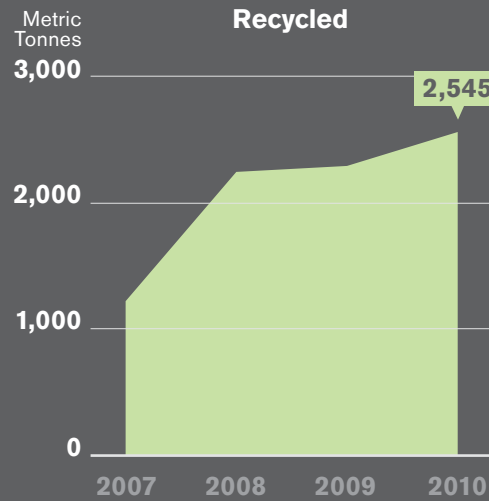
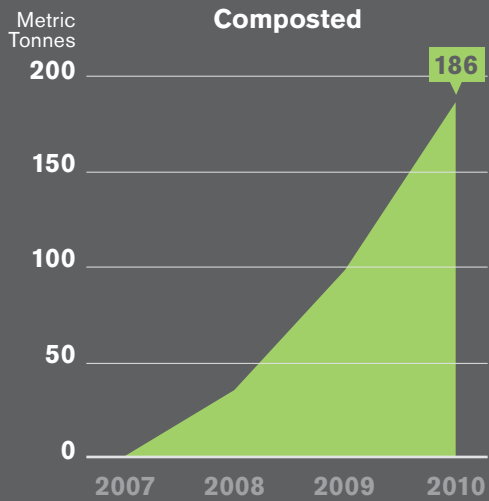
Electronic waste from our offices and warehouses is recycled or disposed of responsibly by a specialist waste contractor. Our customers return all Bloomberg electronic equipment at the end of its useful life for reuse or recycling. In 2010, Bloomberg received 148,849 product returns from customers, which included PCs, flat panel screens, keyboards and biometric devices.

In the Greener Equipment section we outline our approach to equipment reuse and recycling and the steps we took in 2010 to ensure that our electronic waste contractor meets high social and environmental standards.

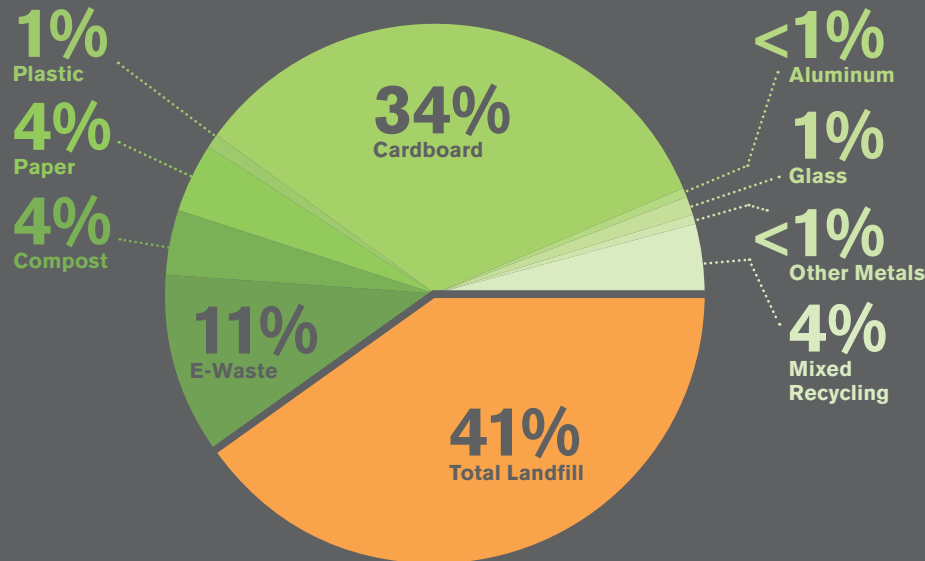
6. U.S. EPA, "Solid Waste Management and Greenhouse Gases: A Life Cycle Assessment of Emissions and Sinks", 3rd ed. Washington, DC, September 2006.

PERFORMANCE

Every year we double our composting rates.



2010 COMPOST, RECYCLING & LANDFILL WASTE



In 2010, we diverted more than **59%** of our waste from landfills.

## Sustainable Pantries

### FACTS AND FIGURES

Every Bloomberg office has a pantry. They are the heart of our offices and an informal gathering place for employees. Pantries provide free drinks, fruit and snacks. Bloomberg sets targets to increase our availability of local, organic and bulk foods for sustainable consumption by our employees. Additionally, we source cups, forks and plates made from materials that are compostable in markets where composting is available (currently NY, NJ and SF).

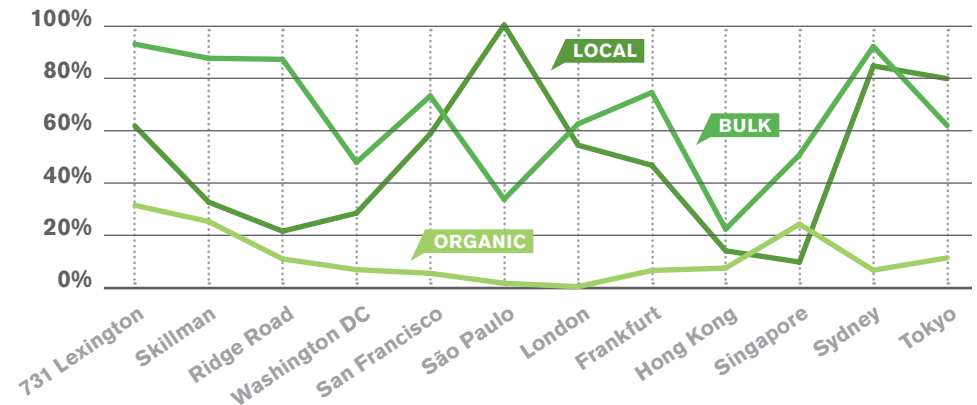
### WASTE

We are reducing emissions from waste by introducing bulk food dispensers in our pantries (which cut down on packaging waste), increasing recycling, and composting biodegradable waste such as paper napkins and biodegradable bowls, plates and cutlery. In 2010, we composted 186 metric tonnes of waste, reducing our waste-associated carbon footprint by 205 metric tonnes.

Cups, bowls, cutlery, napkins and plates in our pantries are made from biodegradable material, thus they can be composted together with food waste. In 2010, we composted 80% of waste from our New York pantries.

All primary Bloomberg offices have eliminated bottled water.

### BGREEN FOOD SOURCING AGAINST TARGETS



#### Bulk

Installation of soda fountains in NYC increased bulk offerings to 85%.

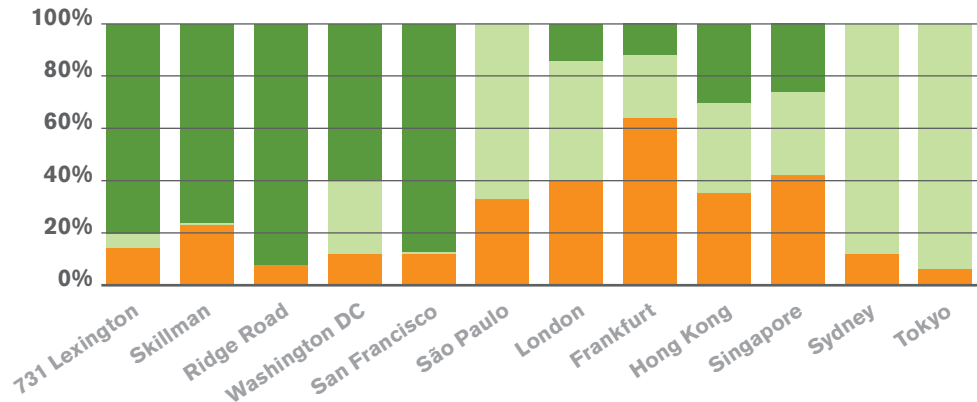
#### Local

Tokyo and São Paulo have the highest percentage of local offerings.

#### Organic

Procuring organic foods is a big challenge from an availability and cost perspective.

### BGREEN PANTRY WASTE



#### Composting

80% of our waste in North America is compostable.

#### Recycling

60% of waste in Asia is recycled where currently no composting is available.

#### Landfill

73% of our pantry waste is diverted from landfills globally.



# PRINTING & PUBLISHING

## Printing

Bloomberg Ink is the Company's in-house print facility. The department printed 9.7 million pieces in 2010, including business cards, nameplates, stationery, and brochures. A range of suppliers produce printed customer marketing material.

We are working to improve the sustainability of our printed materials by reducing paper use, increasing the use of recycled and sustainably sourced paper, and encouraging the use of environmentally preferable inks.

## PERFORMANCE

Environmental achievements in 2010 include:

- Produced zero hazardous waste
- 89% of paper used was certified to the Forest Stewardship Council™ sustainable forest management standard
- Average recycled content of paper was 74%
- 100% of inks are low or no VOC and soy- or vegetable-based

In 2010, we eliminated PMS 811, a fluorescent color from our corporate style guide and replaced it with an environmentally benign alternative.

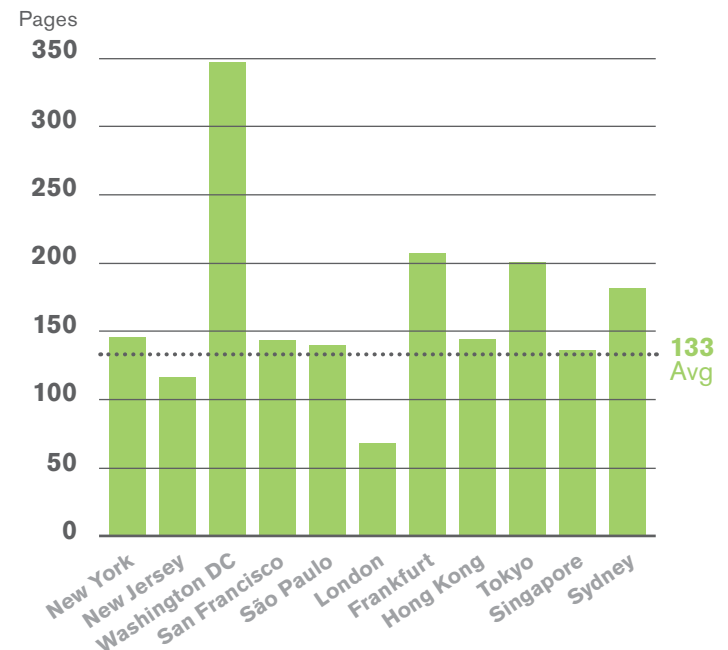
All major suppliers are required to submit a complete materials list prior to approval of the order. The material list requires disclosure of materials used, the amount of recycled content, inks and any toxic materials in the product, and the type of waste associated with manufacturing the product for Bloomberg.

## OFFICE PRINTING

Office paper consumption has been reduced 39% against 2007 levels, but some segments of the organization are still resistant to reduction. Specifically, News and Broadcast-related operations are areas slow to embrace a paperless philosophy, as precautions against technology breakdown require hard-copy redundancies. Further, annual global business planning tends to challenge our paper-reduction efforts.

## MONTHLY PAPER USE BY OFFICE

2010 Average Pages Per Employee



## Magazine Publishing

Bloomberg publishes two magazines: Bloomberg Markets®, which is part of the BLP Core structure, and Bloomberg Businessweek, which was acquired in December, 2009. Both magazines are printed on paper certified to the Forest Stewardship Council™ (FSC®) standards.

### BLOOMBERG MARKETS®

Bloomberg Markets® is a monthly magazine with a circulation of approximately 363,000 at the end of 2010. Carbon emissions associated with paper usage (4,778 metric tonnes in 2010) and the magazine's distribution (3,696 metric tonnes in 2010) are included in the BLP Core data. Markets' total CO<sub>2</sub>e emissions of 8,474 metric tonnes is down 20% from 2007. The reduction was achieved by using paper with a recycled content and more efficient postal addressing. A slight downturn in market conditions reduced circulation marginally.

### BLOOMBERG BUSINESSWEEK

In December 2009, Bloomberg acquired Businessweek magazine, a weekly that in 2010 had an average circulation of 917,000. In 2010, the creation and distribution of Businessweek generated 45,048 metric tonnes of CO<sub>2</sub>e – an addition to BLP Core emissions. After the acquisition, Bloomberg focused on increasing the circulation of the magazine through improved content, a cosmetic redesign and improving paper quality. This resulted in a paper weight increase from 28 lb. stock to 34 lb. stock, increasing the emissions per issue by 21%. In the future, we will be looking for opportunities to reduce the environmental impact of our operations without compromising our business objectives.

## BLOOMBERG INK AND FSC® CERTIFICATION

Bloomberg Ink is our in-house print facility. We print almost 10 million pieces of paper every year – business cards, nameplates, stationery, brochures, etc. – and ship approximately 22,000 packages to customers and offices around the world.

In September 2008, Bloomberg worked with the Rainforest Alliance to begin the certification of Bloomberg Ink to Forest Stewardship Council™ (FSC®) Chain of Custody standards. The process was three-fold, consisting of:

- > A licensing agreement, outlining terms of licensing, trademark usage and copyrights.
- > On-site visit from Rainforest Alliance auditors to review plant processes and separation of FSC-certified products from non-FSC-certified products within the facility. Chain of Custody standards require that FSC-certified products be clearly marked and processed in a manner that ensures no cross-contamination with non-FSC-certified products.
- > A review of the observed results from the on-site audit as well as written facility operation guidelines.

Bloomberg Ink received its FSC Chain of Custody certification in November of 2008, enabling Bloomberg to design, manufacture and distribute products with the FSC label. By 2010, the percentage of FSC-certified paper inventory has increased from 53% in 2008 to 97%. Collaborating with a reputable, independent nonprofit conservation organization committed to transparency helps Bloomberg more effectively communicate our sustainability efforts to our customers, employees and other partners.



The mark of responsible forestry



# WATER USE

Limiting and reducing water usage is a constant consideration throughout our organization. While determining the scale of our global consumption has proven challenging, key reduction projects have been identified and are being implemented.

While we consumed approximately 81 million gallons of water in 2010, given the size of our operations, our water consumption is not excessive. However, we recognize the importance of water conservation, particularly in areas of water scarcity. Therefore, we are looking at ways to improve water efficiencies.

The goal is to reduce our water use by **8.7 MILLION GALLONS.**

## PERFORMANCE

Our target was to reduce our water use by 15 million gallons by 2013. After further examination and careful analysis, we determined that this goal was too optimistic. Bloomberg offices are typically located in large metropolitan areas. In the majority of locations, we do not have the ability to control water use in bathrooms and cooling towers. Also, we subsequently discovered that our data center cooling tower operations had already incorporated optimal water conservation techniques.

We have revised our reduction goal to 8.7 million gallons, just over 10%, based on the following potential savings:

- 4 million gallons by retrofitting bathrooms with low-flow fixtures, more efficient toilets and waterless urinals. We are in the process of installing low-flow urinals, dual flushometers and quicker sink timers at 731 Lexington Avenue. This will save more than 3.7 million gallons per year. When bathroom upgrades are made in new or refurbished offices, we will always utilize low-flow fixtures, which will result in additional savings, conservatively estimated at 0.3 million gallons.
- In NJ, saving 1.7 million gallons by utilizing water softener to improve water quality, enabling cooling towers to utilize water for longer periods.
- More than 3 million gallons by planting meadow grass at our NJ locations – this will eliminate need for watering and mowing a large portion of our two suburban campuses.

# ENVIRONMENTAL OPERATIONS

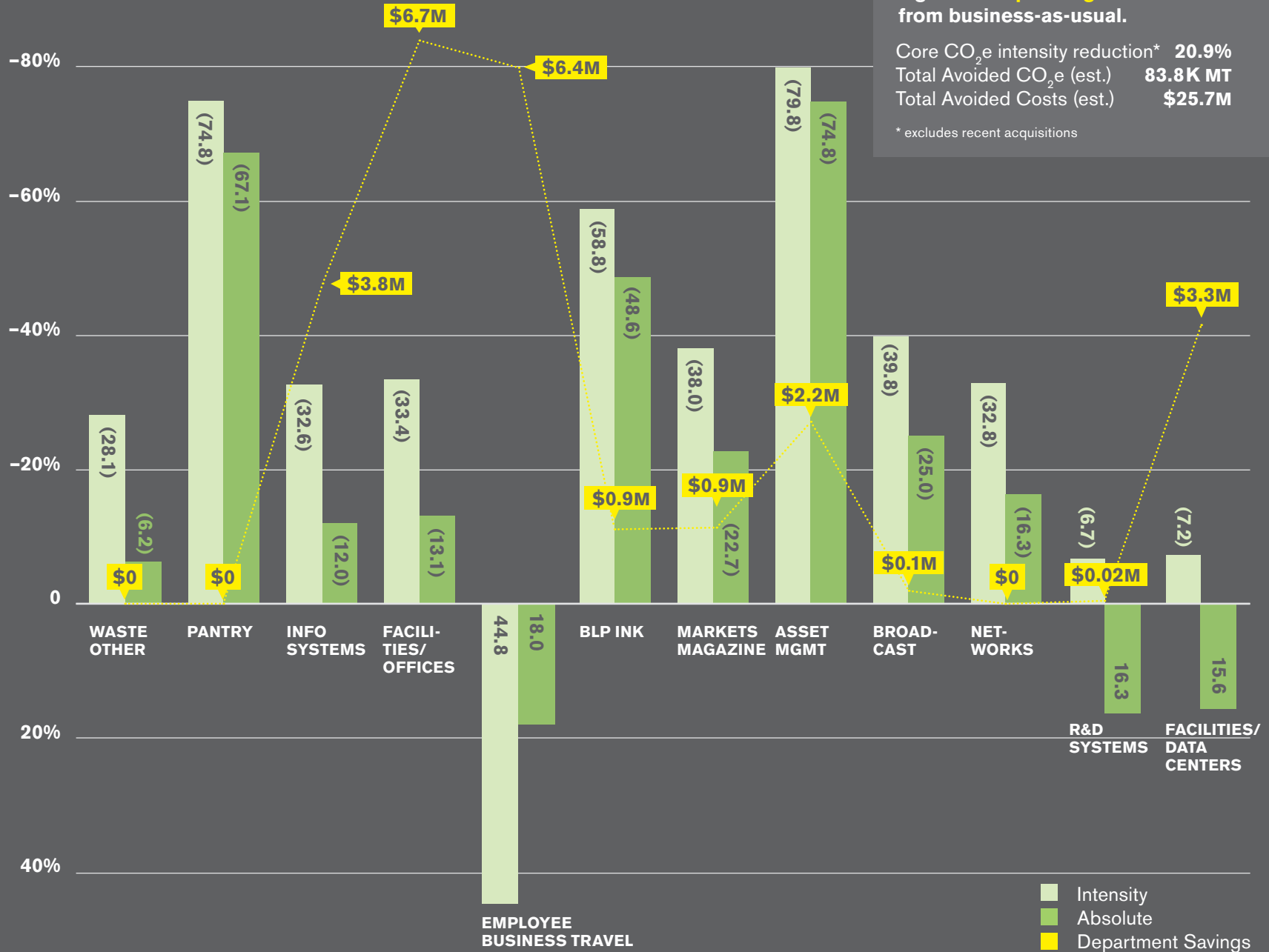
## PERFORMANCE SUMMARY

Percentage Reduction in CO<sub>2</sub>e and Net Savings by Department  
2010 vs. 2007 Baseline

Environmental impact management has resulted in **reduced CO<sub>2</sub>e** and **significant operating cost reductions** from business-as-usual.

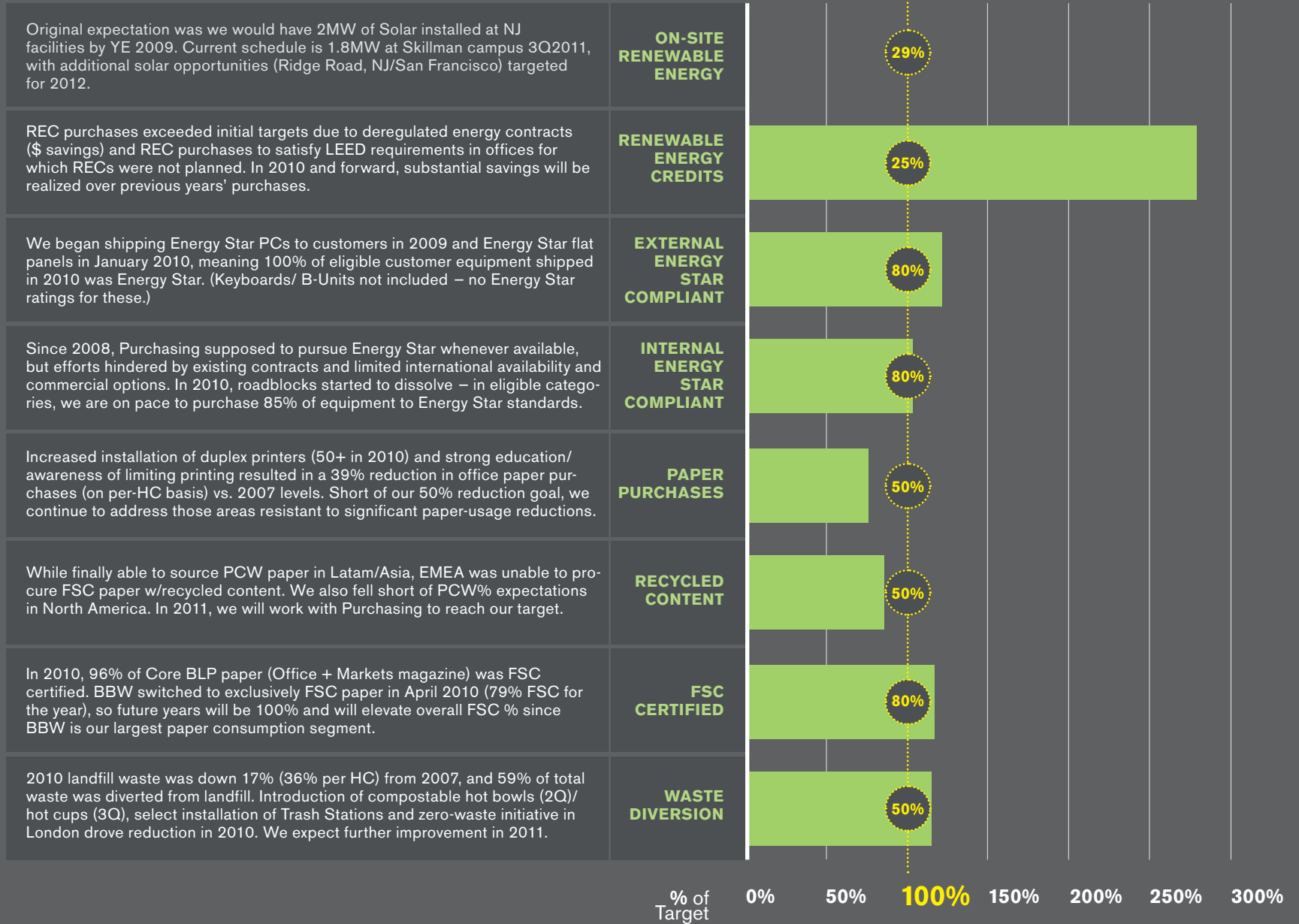
Core CO<sub>2</sub>e intensity reduction\* **20.9%**  
Total Avoided CO<sub>2</sub>e (est.) **83.8K MT**  
Total Avoided Costs (est.) **\$25.7M**

\* excludes recent acquisitions



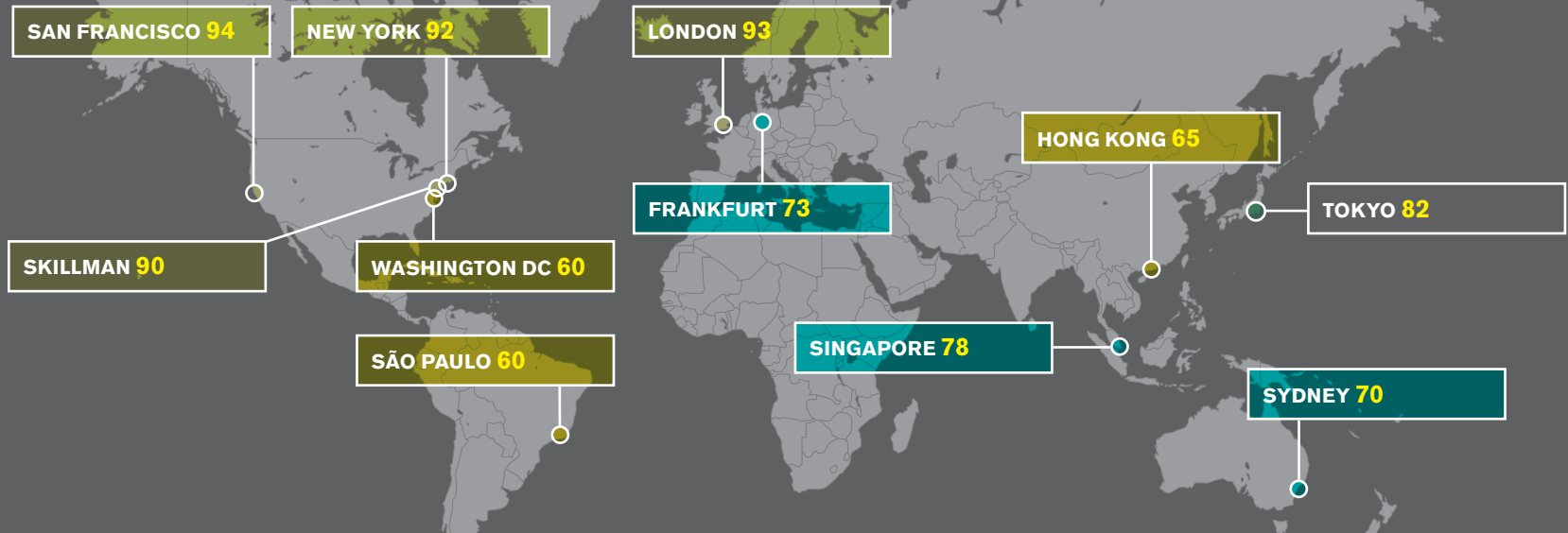
2010 KEY PERFORMANCE SUBMETRICS

Specific activity & targets needed to reach total reduction goals



**REGIONAL SCORING**

Compares offices based on Energy Efficiency, Waste Reduction, Policy Implementation and Employee Engagement to encourage ingenuity within regions to achieve BGREEN goals.



	New York	Skillman	San Francisco	Washington DC	São Paulo	London	Frankfurt	Sydney	Tokyo	Singapore	Hong Kong
<b>Energy Efficiency</b> 45% of score	95% Energy Star Compliant; Full lighting schedule	95% Energy Star Compliant; Full lighting schedule	100% Energy Star Compliant; Full lighting schedule	70% Energy Star Compliant; No Lighting Schedule	Limited Energy Star Purchases; Modified Lighting Schedule	90% Energy Star Compliant; Full lighting schedule	100% Energy Star Purchases; Shorter lighting schedule – News Bureau Office	100% Energy Star Compliant; Full lighting schedule	95% Energy Star Compliant; Full lighting schedule	80% Energy Star Compliant; Modified lighting schedule	56% Energy Star Compliant; Modified lighting schedule
<b>Waste Reduction</b> 40% of score	50% landfill diversion; Compost program; 92% bulk food & drinks; Average per person print rates; 30% duplex printing; 100% recycled content paper	55% landfill diversion; Compost program started Q3; 87% bulk food & drinks; Low per person print rates; 20% duplex printing; 100% recycled content paper	69% landfill diversion; Compost program; 73% bulk food & drinks; 100% duplex printers; Average per person print rates; 30% recycled paper content	21% landfill diversion; 48% bulk food & drinks; 100% duplex printers; High per person print rates; 30% recycled paper content	40% landfill diversion; 33% bulk food & drinks; 30% duplex printers; Average per person print rates; No recycled – FSC Certified	85% landfill diversion; 62% bulk food and drinks; 60% duplex printers; Low per person print rates; 30% recycled paper content	30% landfill diversion; 20% duplex printers; 74% bulk food & drinks; High per person print rates; 0% recycled content office paper; Green Cleaning Program	75% landfill diversion; 75% duplex printers; 92% bulk food & drinks; Average per person print rates; 0% recycled content office paper	72% landfill diversion; 65% duplex printers; 61% bulk food & drinks; High per person print rates; 50% recycled content	30% landfill diversion; 60% duplex printers; 50% bulk food & drinks; Low per person print rates; 10% recycled content office paper	20% landfill diversion; 35% duplex printers; 22% bulk food & drinks; Average per person print rates; 0% recycled content office paper
<b>Policy &amp; Engagement</b> 15% of score	61% local/41% organic; Cleaning/Construction Policies; Monthly Speakers; Numerous BOB events	32% local/25% organic; Green Cleaning Program; Quarterly BOB/Speaker Events	58% local/5% organic; Green Cleaning Program; 1 speaker	28% local/6% organic; Green Cleaning; 1 speaker; 1 BOB event	100% local/1% organic; Green Cleaning; 1 speaker	54% local/0% organic; Green Cleaning; BOB events; Speaker event	46% local/6% organic; Earth Day Speaker	84% local/6% organic; Green Cleaning; BOB events only	80% local/11% organic; Green cleaning; 2 BOB events	9% local/23% organic; Green Cleaning; Earth Day Events	13% local/7% organic; No green cleaning; Earth Day events

## PERFORMANCE BY THE NUMBERS

2010 vs. 2007 Baseline

	UNIT OF MEASURE	FY10	FY09	FY08	FY07	% +/-
<b>Corporate Summary</b>						
Average Full-Time Employees		11,922	10,559	10,173	9,719	22.66%
Average All-In Employees		13,419	11,507	10,829	10,277	30.57%
Revenue (\$B)		6.9	6.3	6.1	5.5	24.63%
<b>Total Facilities</b>						
<b>Total Facilities CO<sub>2</sub>e</b>	Metric Tonnes (MT) of CO <sub>2</sub> e	<b>101,568</b>	<b>96,997</b>	<b>104,611</b>	<b>103,924</b>	<b>(2.27%)</b>
<b>Fac. CO<sub>2</sub>e/All-In Employees</b>	MT/All-In Employees	<b>7.57</b>	<b>8.43</b>	<b>9.66</b>	<b>10.11</b>	<b>(25.15%)</b>
Electricity Consumed	Kilowatt Hrs. (kWh)	241,669,809	231,668,327	239,108,901	234,706,352	2.97%
Elec. Consumed/All-In Employees	Kilowatt Hrs./All-In Employees	18,010	20,133	22,080	22,837	(21.14%)
Gross CO <sub>2</sub> e from Electricity	MT of CO <sub>2</sub> e	97,591	93,325	100,311	100,648	(3.04%)
Elec. CO <sub>2</sub> e/All-In Employees	MT/All-In Employees	7.27	8.11	9.26	9.79	(25.74%)
CO <sub>2</sub> e from Non-Elec. Power	MT of CO <sub>2</sub> e	3,977	3,672	4,299	3,276	21.41%
<b>Business Travel</b>						
<b>Total Travel</b>	Miles Traveled	<b>111,267,818</b>	<b>83,433,977</b>	<b>77,756,534</b>	<b>76,385,906</b>	<b>45.67%</b>
<b>Travel CO<sub>2</sub>e</b>	MT of CO <sub>2</sub> e	<b>33,695</b>	<b>26,054</b>	<b>24,011</b>	<b>23,274</b>	<b>44.78%</b>
<b>Travel CO<sub>2</sub>e/FT Employees</b>	MT/FT Employees	<b>2.83</b>	<b>2.47</b>	<b>2.36</b>	<b>2.39</b>	<b>18.03%</b>
Inter-City Travel	Miles Traveled	105,400,891	78,198,467	72,326,423	70,588,900	49.32%
CO <sub>2</sub> e from Inter-City Travel	MT of CO <sub>2</sub> e	31,471.70	24,072.70	21,934	21,027	49.67%
Intra-City Travel	Miles Traveled	5,865,927	5,235,510	5,430,111	5,797,006	1.21%
CO <sub>2</sub> e from Intra-City Travel	MT of CO <sub>2</sub> e	2,224	1,982	2,077	2,247	(1.04%)
<b>Paper Consumption</b>						
<b>Global Paper Consumption</b>	Lbs. of Paper Used	<b>21,443,326</b>	<b>5,257,805</b>	<b>5,408,291</b>	<b>5,681,246</b>	<b>277.44%</b>
<b>Global Paper CO<sub>2</sub>e</b>	MT of CO <sub>2</sub> e	<b>32,138</b>	<b>7,141</b>	<b>7,948</b>	<b>8,452</b>	<b>280.25%</b>
Markets Magazine Consumption	Lbs. of Paper Used	3,384,192	3,364,411	4,523,035	4,694,031	(27.90%)
Markets Mag CO <sub>2</sub> e	MT of CO <sub>2</sub> e	4,778	4,573	6,922	7,183	(33.49%)
BLP INK Paper Consumption	Lbs. of Paper Used	323,098	239,877	339,562	481,517	(32.90%)
BLP INK CO <sub>2</sub> e	MT of CO <sub>2</sub> e	297	214	380	694	(57.25%)
BLP Press Paper Consumption	Lbs. of Paper Used	–	196,077	279,140	184,000	–
BLP Press CO <sub>2</sub> e	MT of CO <sub>2</sub> e	–	246	374	245	–
Other Global Paper Consumption	Lbs. of Paper Used	312,499	280,590	266,554	321,698	(2.86%)
Other Global Paper CO <sub>2</sub> e	MT of CO <sub>2</sub> e	399	307	272	329	21.51%
Businessweek Consumption	Lbs. of Paper Used	17,423,537	1,176,850	–	–	–
Businessweek Paper CO <sub>2</sub> e	MT of CO <sub>2</sub> e	26,664	1,801	–	–	–



	UNIT OF MEASURE	FY10	FY09	FY08	FY07	% +/-(-)
<b>Supply Chain</b>						
<b>Total Shipments CO<sub>2</sub>e</b>	MT of CO <sub>2</sub> e	<b>24,109</b>	<b>7,390</b>	<b>9,643</b>	<b>11,370</b>	<b>112.04%</b>
Total Items Shipped	# of Line Items	421,238	422,419	436,669	412,419	2.14%
Total Weight Shipped	MT Shipped	4,576	5,458	10,149	8,519	(44.19%)
Weight of Ground/Sea Shipments	MT Shipped	3,741	4,484	9,015	6,963	(46.27%)
Ground/Sea Shipments CO <sub>2</sub> e	MT of CO <sub>2</sub> e	159	155	1,093	509	(68.86%)
Weight of Air Shipments	MT Shipped	835	974	1,071	1,507	(44.63%)
Air Shipments CO <sub>2</sub> e	MT of CO <sub>2</sub> e	1,870	2,491	4,757	7,078	(73.57%)
Add'l SC: Markets Mag Distribution	Annual Circulation	4,689,485	4,500,351	4,812,982	4,800,220	(2.31%)
Markets Mag Distribution CO <sub>2</sub> e	MT of CO <sub>2</sub> e	3,696	3,547	3,794	3,783	(2.31%)
Add'l SC: Businessweek Distribution	December 2009 Circulation	50,455,465	3,043,697	-	-	-
Businessweek Distribution CO <sub>2</sub> e	MT of CO <sub>2</sub> e	18,384	1,197	-	-	-
<b>Waste</b>						
<b>Total Global Waste</b>	Tons (2k lbs.) of Waste	<b>5,084</b>	<b>4,751</b>	<b>4,871</b>	<b>-</b>	<b>4.38%</b>
<b>% of Total Global Waste Diverted</b>	MT of CO <sub>2</sub> e	<b>59%</b>	<b>55%</b>	<b>51%</b>	<b>-</b>	<b>15.06%</b>
Global Landfill Waste	Tons (2k lbs.) of Waste	2,073	2,134	2,364	2,487	(16.64%)
Global Landfill Waste/All-In HC	Lbs. Waste/All-In HC	383	394	437	484	(20.89%)
Global Landfill Waste CO <sub>2</sub> e	MT	2,067	2,123	2,357	2,479	(16.64%)
Global Recycling	Tons (2k lbs.) of Recycling	2,806	2,509	2,469	-	13.64%
Global Recycling/All-In HC	Lbs. Recycling/All-In HC	488	436	456	-	6.95%
Global Compost	Tons (2k lbs.) of Compost	206	108	38	-	435.65%
Global Compost/Applicable HC	Lbs. Compost/Applicable HC	42	35	17	-	155.59%
<b>Total CO<sub>2</sub>e Reconciliation</b>		<b>193,577.12</b>	<b>139,705.30</b>	<b>148,570.02</b>	<b>149,499.06</b>	<b>29.48%</b>
<b>CO<sub>2</sub>e/\$1M of Revenue</b>		<b>28.14</b>	<b>22.34</b>	<b>24.27</b>	<b>27.08</b>	<b>3.90%</b>
<b>CO<sub>2</sub>e/FT HC</b>		<b>16.24</b>	<b>13.23</b>	<b>14.60</b>	<b>15.38</b>	<b>5.56%</b>
		<b>11.18%</b>	<b>(13.98%)</b>	<b>(5.05%)</b>	<b>-</b>	

COMMENTS: Avg. All-In Employees includes Part-Time, Contractors, etc.; Electricity Consumed includes all components of Facilities (R&D, IS, Networks); CO<sub>2</sub>e from Non-electric Power includes Natural Gas, Steam, Oil, Refrigerants; Inter-City Travel (Between Cities) includes Commercial Air, Private Aircraft and Rail; Intra-City Travel (Within Cities) includes Car Rental, Car Service, Taxi and Field Service Car miles; BLP Press discontinued in-house; Businessweek Paper acquired December 2009; Supply Chain includes BLP INK shipping data; Businessweek Distribution began in December 2009; Landfill Waste is any waste that cannot be recycled or composted; Global Recycling: we do not track recycling CO<sub>2</sub>e (E-waste, metals, paper, plastic, cardboard, aluminum & glass); Composting Programs underway in 731 Lex (5,780 HC), SF (184 HC), Skillman (1,290 HC) & London (2,241 HC).



# SUPPLY CHAIN



# SUPPLY CHAIN

Bloomberg buys a wide range of goods and services, including consultancy and IT support, office supplies, paper for our publications and components for our Terminals. We want to source from companies that maintain high labor and environmental standards.

Bloomberg's supply chain extends around the globe. To serve customers in 160 countries, we work with vendors large and small to ensure that they are compliant with the highest social and environmental standards.

Sourcing locally when and where it makes sense while maintaining consistent quality requires coordination among Purchasing, Asset Management, Operations, Facilities and our various businesses.

We have more than 300 stocking locations globally, with three major distribution centers in New York, London and Tokyo.

## OUR POLICIES

Our sustainability vision is supported by specific environmental guidelines:

**Purchasing** – environmentally preferred purchasing guidelines

**Facilities** – green construction policy, solid waste management policy, green cleaning policy, integrated pest management policy

**Product Engineering** – sustainable electronic manufacturing policy

**Marketing** – corporate green design policy, third-party printer guidelines, corporate green events policy

**Supply Chain** – sustainable warehouse guidelines

**Information Systems** – energy efficient equipment guidelines

**Field Service** – vehicle procurement/leasing

# SUPPLIER REQUIREMENTS

## Globalization, and sourcing diversification create unique opportunities and challenges for supply chain management.

In 2009, we established sustainability requirements in supplier request for proposals (RFP) and in master service contracts. In summary, our suppliers are required to:

- Comply with health, safety, labor and environmental regulations
- Provide accurate answers to the Bloomberg Environmental Performance Survey
- Not discriminate against employees
- Maintain adequate safety standards
- Not employ anyone under the age of 15 years

We require suppliers to outline their environmental initiatives, including policies and procedures and information about what makes their goods and services environmentally preferable.

We define “environmentally preferable” as products that:

- Contain recycled material, are recyclable and/or reusable
- Have reduced embedded energy and carbon emissions, or that help Bloomberg and its customers reduce energy use and carbon footprints

- Contain reduced amounts of harmful chemicals
- Are certified to a recognized environmental standard

Our purchasing department, which buys on behalf of other departments (the users), works closely with our sustainability team. If there is no price premium, we always buy goods and services that are environmentally preferable if they also meet our quality requirements. If the premium is five percent or less, we make a strong argument to users, asking them to consider paying the premium as a justifiable business decision. Environmentally preferable options with a premium over five percent are offered to the users so that they can assess the overall value of the options open to them.

The purchasing department provides the sustainability team with a summary of the environmentally preferable offers made to departments, as requested.

Our supplier guidelines are informed by guidance and standards from the:

- Electronic Industry Citizenship Coalition
- International Labor Organization (ILO)
- ILO Code of Practice in Safety and Health
- Universal Declaration of Human Rights
- Social Accountability International (SAI)
- Ethical Trading Initiative (ETI)

# GREENER EQUIPMENT

## Bloomberg maintains a philosophy of cradle-to-grave electronic equipment management.

We conduct life-cycle assessments (LCA) of our equipment and audits of equipment retirement. We believe our equipment is our responsibility.

The Bloomberg Professional® service is used by thousands of organizations globally to access critical financial information. With this service, almost all customers use some Bloomberg-provided equipment, which could be two or more 19-inch, 17-inch or 15-inch flat-panel screens, a dedicated keyboard and/or a personal authentication device called the “B-Unit” (a biometric scanner that allows users to access their Terminal remotely).

We have developed Engineering Product Guidelines to reduce the environmental impact of our equipment, including design, durability, recyclability and water use. The guidelines cover four areas:

- **Minimize use of hazardous materials** and achieve compliance with the EU’s Restriction of Hazardous Substances directive.
- **Product Disposal/Recycling:** Bloomberg takes sole responsibility for its equipment and ensures that it is recycled in an environmentally benign way. We commit to taking back our products from countries even if the local or federal laws of that country do not require us to do so.
- **Improve energy efficiency** and meet EPA Energy Star requirements.
- **Extend the useful life of the Terminal** and design for recyclability.

### PRODUCT ENVIRONMENTAL AUDIT

We conducted an environmental audit of our portfolio of customer equipment in 2009. This showed that the majority of our equipment performed well against criteria ranging from chemical use to product take-back. We are using the results to target improvements.

We believe our equipment is **OUR RESPONSIBILITY.**

**ASSESSING LIFE-CYCLE IMPACTS**

Environmental impacts occur at each stage of the life cycle of our electronic products, from manufacturing, through transport to customers, use, and recycling or disposal. We want to understand these life-cycle effects so we can maximize our emissions-reduction efforts.

We participated in the Product Life Cycle Accounting and Reporting Standard pilot road test for the World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD). This involved evaluating the emissions generated during the life cycle of our 19" twin flat panel (non-Energy Star). Phases included raw material extraction, electronic component and housing manufacturing, assembly, warehousing, distribution, consumer use, refurbishment and recycling or disposal. The results are below.

**POTENTIAL IMPROVEMENTS**

Bloomberg contracts with others to manufacture the panels and has limited control during that phase. But the study has identified areas for potential emissions reductions. These include:

- Engaging panel suppliers in discussions about how to reduce manufacturing emissions and in the use of new technologies, such as backlight systems and organic light-emitting diode technology
- Investigating what could be done with panel glass at the end of its life to promote recycling
- Helping our customers use the various power-management options that reduce emissions

**PERFORMANCE**

All our customer equipment is designed for recyclability and complies with the EU's Restriction of Hazardous Substances directive.

In 2009, we launched our greenest flat panels yet. On average, these screens use 8% less energy than the previous version and all our new flat panels are certified to the U.S. Environmental Protection Agency's Energy Star standard. Bloomberg placed 1,948 Energy Star Flat Panels into the field in 2010, saving approximately 149,000 kWh annually, the equivalent of 60 metric tons of CO<sub>2</sub>.

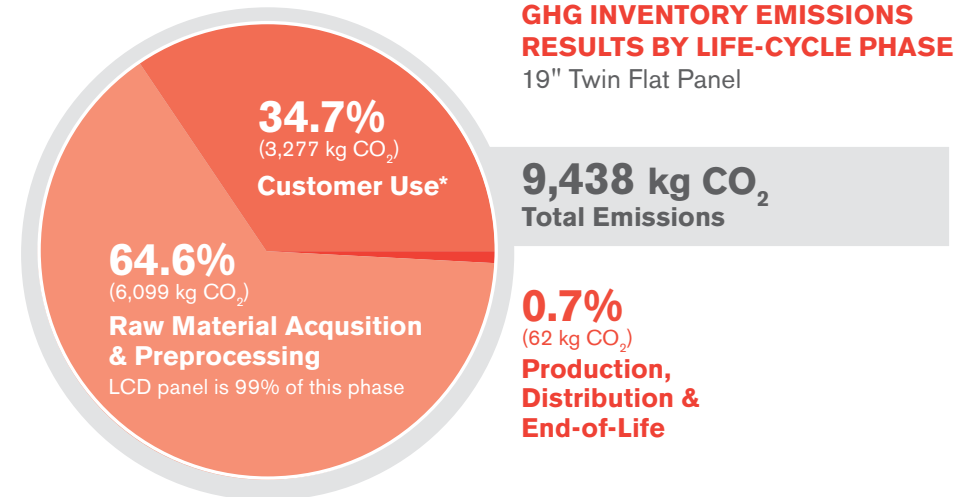
Flat panels that are returned to Bloomberg are retrofitted to Energy Star requirements and all new manufactured flat panels comply with Energy Star requirements.

The flat panel achieved Gold status through the Electronic Product Environmental Assessment Tool (EPEAT), a certification program that evaluates products using 51 environmental criteria.

**CUSTOMER-FACING EQUIPMENT**

**Customer-facing equipment is designed to meet applicable environmental standards**

Product	% of Customers Using	Action Taken
PCs	8.9%	Energy Star compliant since beginning of 2008
Flat Panels	9.6%	Energy Star compliant since beginning of 2010
Keyboards	100%	More environmentally friendly raw materials, reduced shipping weight by 40%
B-Unit	100%	More environmentally friendly raw materials, increased battery life from 3 years to 5 years, reduced shipping weight by 30%



\*Customer Use Assumption: Flat Panel is "on" 24/7 for 5 years.

We redesigned our B-Unit authentication device to increase its battery life; now it can be used for longer periods between charges.

## PACKAGING

Our goal is to improve the sustainability of our product packaging by:

- Reducing the amount and weight of materials used.
- Replacing petroleum-based materials with those made from paper, cardboard, and natural products.
- Redesigning packaging so that more equipment can be transported in each load, thus reducing fuel use.

Achievements include:

- Introduced lightweight, air-filled transport packaging that can be reused.
- Reduced the weight of our keyboards.
- B-Unit packaging has been changed to stand-alone units that no longer require us to insert the boxes into bigger mailing packages. Additionally, the materials are all sourced from recycled sources and are fully recyclable.

In 2010, we assessed the possibility of using packaging that is made from bio-based materials, is biodegradable and uses no petroleum-based products. Tests on this packaging began in 2011.

## REUSE AND RECYCLING

All Bloomberg equipment at customer sites is leased and returned at end of use. At that point, the equipment is:

- Reused by other customers or within the company.
- Refurbished for reuse.
- Disassembled, with any useful parts being retained for refurbishment of other equipment, and all other material reused/recycled in some form.

In 2010, Bloomberg received 148,849 product returns from customers, which included PCs, flat panels, keyboards, and biometric devices (B-Units). All the equipment was reused or recycled.

## ASSESSING RECYCLING SUPPLIERS

In 2009, we conducted an assessment of our equipment recycling suppliers to determine standards and management processes related to environmental and labor standards.

We contacted the 27 companies worldwide that handle Bloomberg electronic waste and received a response rate of 85%.

We began by sending a certificate of compliance that required companies to affirm that they had no violations or pending lawsuits that could jeopardize them or Bloomberg and that they had environmental insurance and auditing procedures in place for their own supply chain.

We also sent a self-assessment questionnaire to evaluate environmental practices and policies. We used the results to build a scorecard that ranked companies' environmental performance.

This determined that approximately 90% of our waste equipment goes to locations operating effectively (locations scoring above 80%).

We are taking the following steps to improve performance:

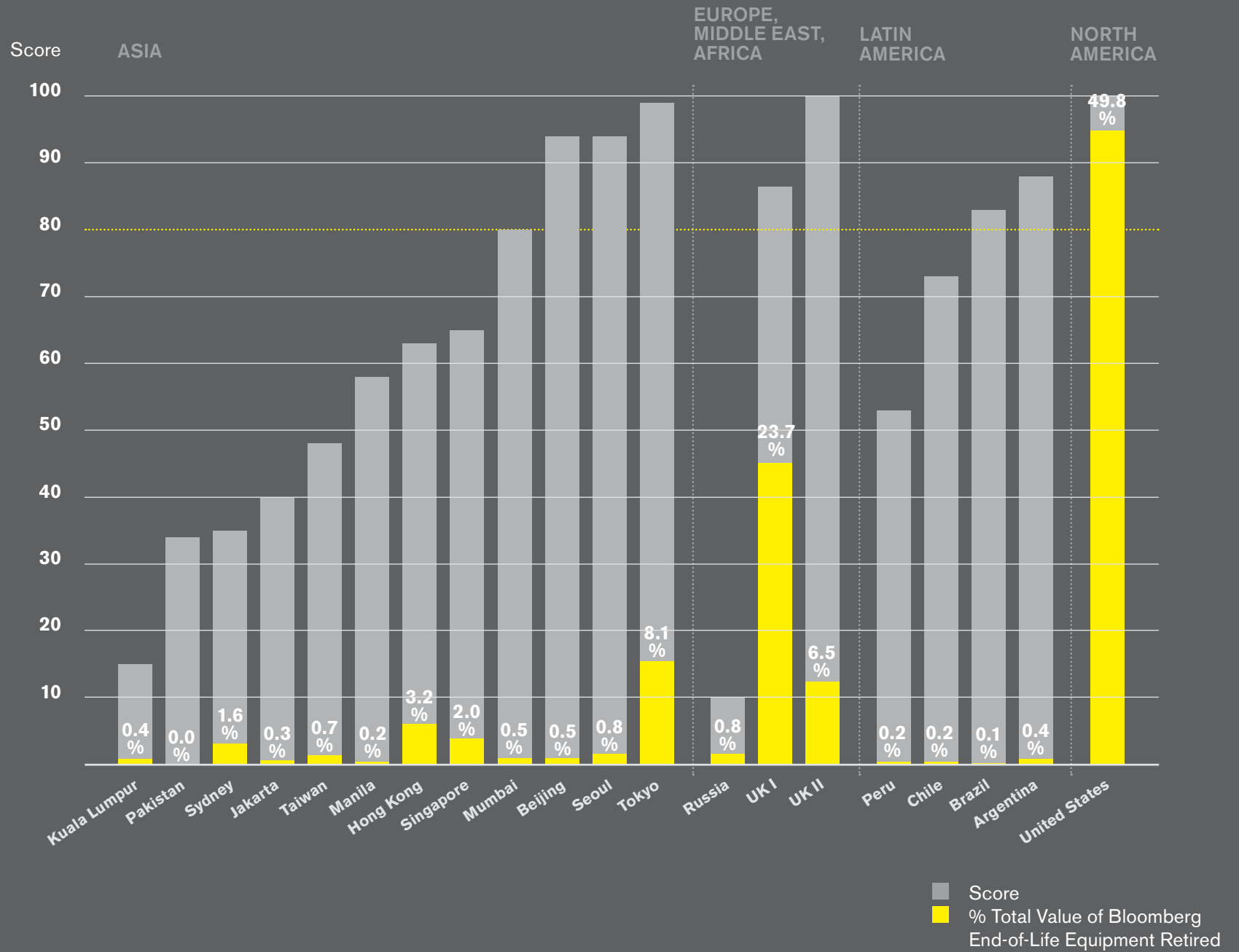
- Shifting more business to high-scoring providers.
- Performing our own on-site audit of partners or contracting a third party to audit.
- Requiring low-scoring vendors to be certified by a reputable third-party organization.

We are partnering with the Basel Action Network's (BAN) e-Stewards certification program. BAN is the world's only organization focused on confronting the global e-waste problem and its impacts on the environment and human rights. Bloomberg intends to work with BAN to support its e-Stewards program – a certification program for recyclers and scrappers who conform with standards that are consistent with ISO 14001 procedures. E-stewards pledge to use only globally responsible and safe means to dispose of e-waste, including no disposal in landfills or incinerators, no prison labor and no export to poor communities.

# GREENER EQUIPMENT

## SCRAPPER ANALYSIS

90% of our end-of-life equipment is responsibly retired by vendors who scored 80+



# PRINT & OFFICE PAPER SOURCING

Bloomberg owns two magazines, operates an in-house print facility and consumes office paper for standard business operations. Responsible sourcing is critical.

## MAGAZINES

Bloomberg Markets® magazine's monthly circulation was approximately 363,000 at the end of 2010. Most copies are sent to our Terminal users. The magazine also has subscribers and is sold on newsstands.

Sustainability achievements for Markets magazine include:

- Launching an environmental news section to raise readers' awareness of sustainability topics
- Using 10% recycled content per issue
- Using paper that is certified FSC Mixed Sources
- Using 7% soy ink

Bloomberg Businessweek magazine, purchased in 2009, now uses FSC-certified paper. Please see Environmental Section for further details on the changes since the acquisition.

## MAGAZINE PAPER

Distribution Impact Per Issue

Magazine	Paper Usage per Issue (lbs.)	Paper CO <sub>2</sub> e per Issue (kg)	Distribution CO <sub>2</sub> e per Issue (kg)
Businessweek	0.35	0.53	0.39
Markets	0.72	1.02	0.84

## TOTAL NUMBER OF ISSUES PRINTED

Calendar Year 2010

**Businessweek**  
**50,455,465**

**Markets**  
**4,689,485**

All our publications are **PRINTED ON FSC-CERTIFIED PAPER.**



**OFFICE PAPER**

Buying recycled paper helps reduce the use of virgin resources and supports the market for recycling. Our policy is to source recycled office paper with a high proportion of post-consumer waste and from sustainably managed forests certified by the FSC.

**PERFORMANCE**

In 2010, 42% of the office paper we purchased had 50% or more post-consumer recycled content, 69% was FSC-certified.

**BOOKS**

Wiley Publications publishes books under the Bloomberg Press imprint, under license. Bloomberg and Wiley collaborated during 2010 after the licensing agreement was completed to ensure that the publication of our titles was consistent with our overall environmental efforts. Starting in January of 2011, all new print and reprint runs of Bloomberg Press licensed through Wiley Publications will be printed on FSC-certified paper.

**2010 OFFICE PAPER SOURCING**

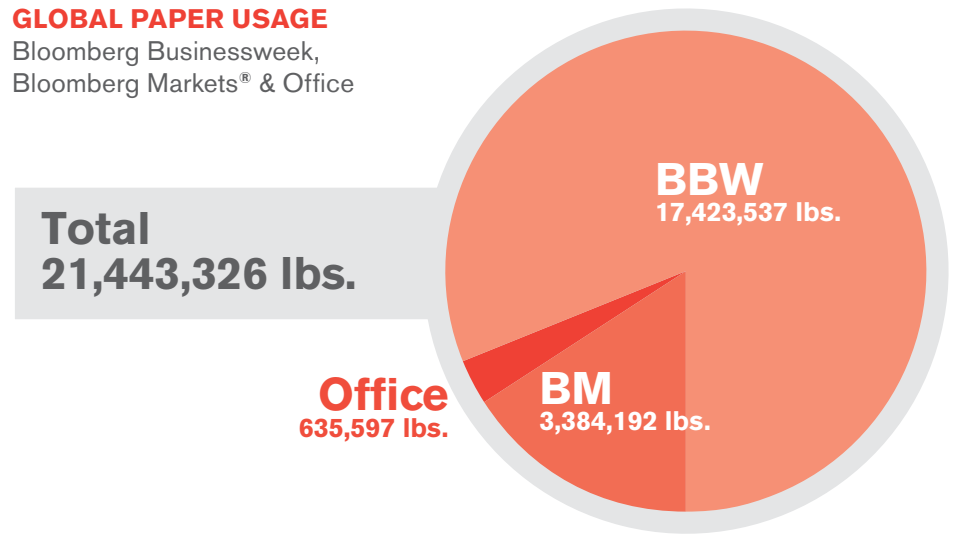
Region	Total Lbs.	Forest Stewardship Council	Post Consumer Waste	PCW Detail	
Europe, Middle East & Asia	58,487	58,487	0	-	
North America	521,977	348,961	256,083	10%	4,106
				30%	8,567
				100%	243,410
Asia	49,624	28,832	17,446	20%	3,005
				50%	4,043
				70%	625
				100%	9,773
Latin America	5,508	0	4,602	100%	4,602

**TOTAL FSC USED OVER 68%**

**TOTAL PCW USED OVER 43%**

**BLOOMBERG 2010 GLOBAL PAPER USAGE**

Bloomberg Businessweek, Bloomberg Markets® & Office



# IMPLEMENTING OUR STANDARDS

## We have developed Environmentally Preferred Operating Guidelines.

These are designed to ensure that our employees consider the impact of their purchasing decisions on the environment and human health.

### TRAINING BLOOMBERG BUYERS

In 2009, all Bloomberg buyers were given green procurement training by external experts. The training session was broadcast around the world to our global buyers. We trained 50 employees in Purchasing to increase compliance with our sustainability procurement guidelines.

### ASSESSING THE ENVIRONMENTAL IMPACTS OF OUR SUPPLY CHAIN

In 2009, we rolled out the first Bloomberg Environmental Performance study for suppliers – it captured environmental key performance information from 86 suppliers representing approximately 25% of our total supplier spend. We then provided feedback and indicated areas of improvement to help low-scoring suppliers improve their performance.

In 2010, we worked to include a carbon metric in purchasing decisions. The metric is a tool for global buyers to weigh a variety of sustainable indicators, including amount of electricity consumed by equipment and distance traveled.

### ON-SITE AUDITS

Our Quality Assurance team, supported by a third-party organization, audits Bloomberg manufacturing suppliers.

Assessments of working conditions, safety, and worker compensation are included in the audits.

Since early 2009, we have audited four companies in China. Two are suppliers of electronic equipment, one is a supplier of marketing items, and the fourth was a potential new supplier. We use a risk-based approach to selecting suppliers that considers the following factors:

- The location of the supplier
- Other factors that indicate a high risk of substandard manufacturing conditions
- The volume of product they supply to Bloomberg

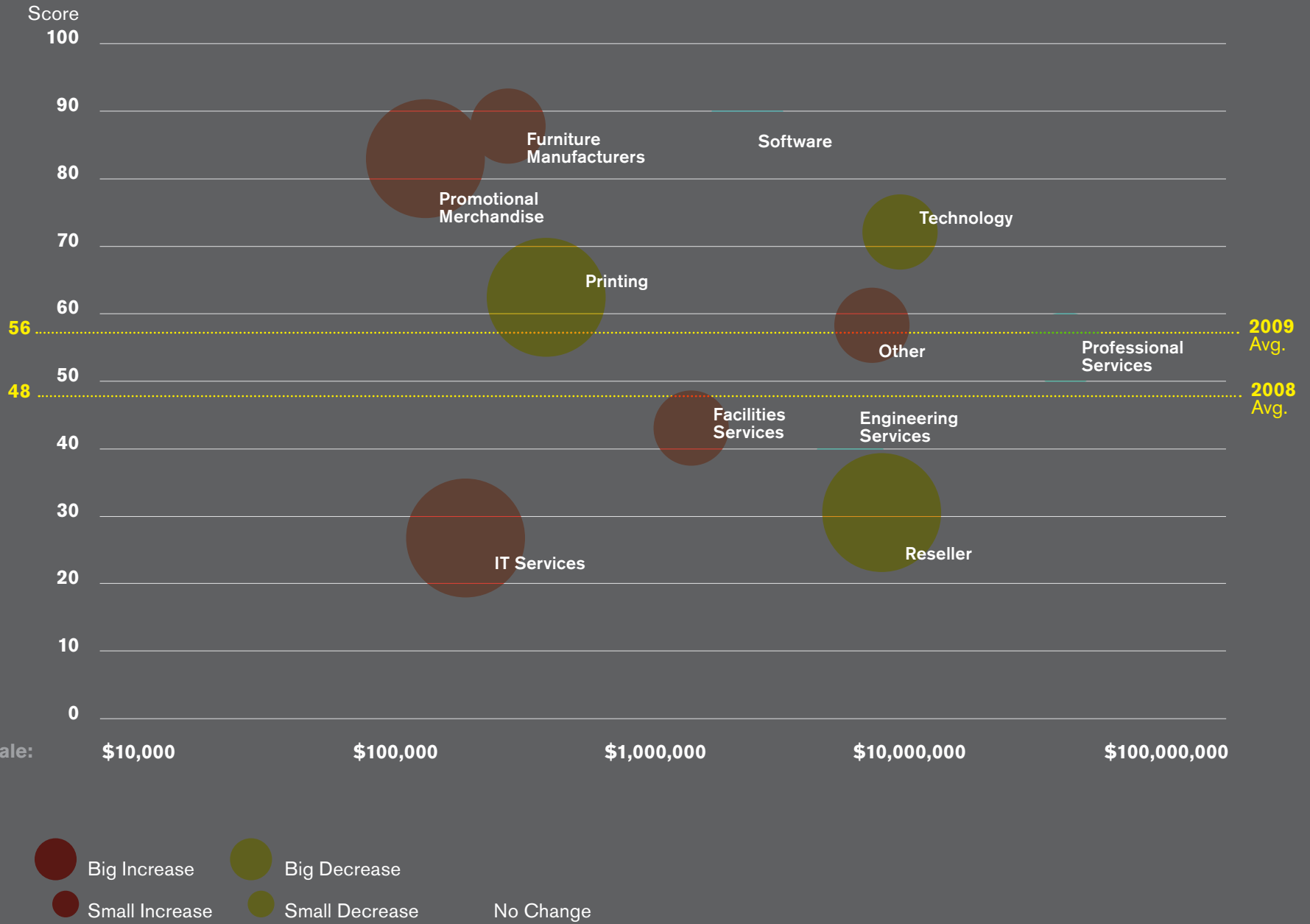
The audits assess compliance with local labor and health and safety laws. Specifically they assess:

- Living accommodations
- Machine safety
- Ventilation
- Eye wash and first aid availability
- Fire safety
- Accessibility to exits
- Working hours, overtime and wages
- Age of employee

Where necessary, we indicate corrective actions that suppliers must implement. Our current audit procedures do not take into account environmental risks and assessments, but we look to incorporate them in the process in 2011.

# IMPLEMENTING STANDARDS

**2009 INDUSTRY VENDOR SURVEY**  
Average Change in Score per Industry vs. 2008



# SOCIAL INVESTMENT



# SOCIAL INVESTMENT

Volunteerism and charitable giving are cornerstones of our culture and critical enablers of our sustainability goals.

A culture of giving back to the community — embedded within the company from its founding — has ensured that our operational and employee efforts around the environment achieved early success and immediate adoption within the walls of Bloomberg.

We donate money, time, and expertise to helping charities and nonprofit organizations globally. Bloomberg is committed to improving the environment and the quality of life in the communities where our employees live and work. Senior management actively participates. We encourage all our employees to reflect their charitable interests in our efforts and to be fully engaged in our philanthropy, developing the next generation of philanthropists.

## OUR FOCUS

Bloomberg's global philanthropy is focused on five core areas:

**Arts** initiatives that exemplify the company's core principles: innovation, access and education

**Education** initiatives that advance academic achievement

**Health and medical research** to improve public health and eradicate life-threatening diseases

**Environmental organizations** that support the company's sustainability efforts and preserve the world's natural resources

**Human Services** programs that empower the disadvantaged to strengthen their communities

Bloomberg is still aligning its philanthropy and sustainability efforts. In early 2011, Bloomberg became a member of the Boston College Carroll School of Management Center for Corporate Citizenship (CCC) to help us better define, plan and operationalize our corporate giving and align it with our other sustainability-related issues.

Our giving is now supporting our overall sustainability goals in specific areas we feel best allocate our expertise and influence, and addresses specific local issues as well as broader global ones.

**ORGANIZATIONAL SUPPORT**

**811**

**NORTH AMERICA**

**13**

**LATIN AMERICA**

**143**

**EUROPE, MIDDLE EAST  
& AFRICA**

**56**

**ASIA PACIFIC**

**NUMBER OF  
PHILANTHROPIC  
ORGANIZATIONS  
WORLDWIDE**

**1,023**

**ARTS 256**  
**CIVIC/JOURNALISM 102**  
**EDUCATION 102**  
**ENVIRONMENTAL 58**  
**HEALTH 131**  
**HUMAN SERVICES 374**

**ORGANIZATIONAL SUPPORT** As a global firm with broad reach, we engage our employees and communities in different ways in different parts of the world. Programs are driven by employee interest, regional issues and/or global challenges. Any employee can submit his or her idea for support. It is then reviewed by the Philanthropy team and internal subject area resources as well as some external organizations to determine whether it is consistent with our efforts. This graphic is a 2010 snapshot of types of organizations we supported and our total giving comfortably exceeds 1% of our pre-tax profit.

# IMPROVING OUR COMMUNITIES

Bloomberg's philanthropy program lies at the core of the company's culture, supporting charities and nonprofit organizations around the world.

## **OPPORTUNITIES TO VOLUNTEER**

Our Best of Bloomberg (BOB) service program, inspired by our founder Michael R. Bloomberg, encourages employees to devote time, resources, and expertise to the many charitable organizations we support. Projects range from "extra-hands" initiatives involving meal deliveries for homebound chronically ill persons and urban agriculture activities, to skills-based service opportunities leveraging employee skills and talents to strengthen the nonprofit sector. Bloomberg has volunteer programs in approximately 50 cities.

Traditionally, December is the time we launch the service program with a month-long calendar of volunteer activities to coincide with the holiday season. The momentum from this effort is carried into the New Year with projects offered year-round to utilize diverse skills and accommodate availability.

Employees are given time off during work hours to volunteer with organizations aligned with our corporate-giving program. Projects are also offered after work, in the workplace, and on weekends, when employees are encouraged to invite friends and family to participate as a way to promote service. Volunteer opportunities are posted on the company's intranet, sent to employees via email and featured on the philanthropy site on the Bloomberg Terminal, which is accessible to all Bloomberg offices worldwide. Extensive outreach that ensures all employees, regardless of their location, can engage in service locally. In addition, speakers and representatives from organizations we support come into the office to inspire and educate employees about projects in which they can engage.

Bloomberg recognizes employee efforts each year at the annual employee recognition awards ceremony, Applause!, hosted in New York, London and Tokyo. Employees nominate colleagues for their work in volunteerism, sustainability and charitable giving. Applause! celebrates employee engagement and promotes community service.

Bloomberg is committed to **IMPROVING THE ENVIRONMENT AND QUALITY OF LIFE** in the communities where our employees live and work.

**BEST OF BLOOMBERG**

Forty-four percent of Bloomberg employees volunteered in 2010, up 14% from 2009. Bloomberg employees participated in 550 community service projects worldwide with 175 nonprofit and non-governmental organizations. 700 employees participated in cause-related races/walks to raise funds for medical research. 1,149 employees contributed \$200,209 to disaster relief efforts in Haiti, Pakistan and Chili.

**EMPLOYEE MATCH PROGRAM & DOLLARS FOR HOURS**

Employees can gain up to \$10,000 for charity through two programs: Bloomberg Employee Matching Program, which matches employees contribution up to \$5,000 per year, and Dollars for Your Hours, which incentivizes volunteers by making \$5,000 charitable contributions to a registered charity of the volunteer's choice if the employee volunteers 25 or more hours a year. Between both these programs, Bloomberg has donated more than \$1M on behalf of its employees. Bloomberg also matches employee donations to approved organizations that are first responders to natural disasters. These organizations include: Doctors Without Borders/Médecins Sans Frontières, Friends of the World Food Program, the International Rescue Committee, the International Response Fund of the American Red Cross, the Mayor's Fund to Advance New York City and UNICEF.

**ENCOURAGING GREATER GIVING**

Bloomberg encourages greater involvement in charitable causes through our Hot Tickets program that offers employees complimentary tickets to local charitable and cultural events supported by Bloomberg. Funds raised at these events offer vital support to nonprofit organizations.

Bloomberg Arts Club creates occasions for Bloomberg customers to view exhibitions at leading museums and cultural institutions in New York, Chicago, London, Tokyo, and San Francisco. This program provides museums opportunities for cultivation of additional supporters while introducing our customers to projects and programs sponsored by Bloomberg.

**VOLUNTEER HOURS**

Region	2010		2009		2008	
	# Employees (unique)	Volunteer Hours	# Employees (unique)	Volunteer Hours	# Employees (unique)	Volunteer Hours
North America	3,488	13,540	2,780	11,255	2,657	8,918
Latin America	79	555	69	467	73	321
Europe/EMEA	1,235	5,919	1,342	7,066	1,169	7,223
Asia Pacific	766	3,580	704	3,452	935	4,981
<b>Total</b>	<b>5,568</b>	<b>23,595</b>	<b>4,895</b>	<b>22,240</b>	<b>4,834</b>	<b>21,443</b>

**EMPLOYEE MATCH PROGRAM**

Region	2010		2009		2008	
	# Employees (unique)	\$ Matched	# Employees (unique)	\$ Matched	# Employees (unique)	\$ Matched
Americas	229	320,044	286	279,444	65	76,064
Europe/EMEA	62	109,880	115	120,870	40	54,547
Asia Pacific	18	31,801	–	–	–	–
<b>Total</b>	<b>320</b>	<b>496,965</b>	<b>401</b>	<b>400,314</b>	<b>105</b>	<b>130,611</b>

**DOLLARS FOR HOURS**

Region	2010		2009		2008	
	# Employees (unique)	\$ Matched	# Employees (unique)	\$ Matched	# Employees (unique)	\$ Matched
Americas	135	520,000	142	587,500	n/a	n/a
Europe/EMEA	23	125,500	21	102,137	n/a	n/a
Asia Pacific	8	37,681	–	–	–	–
<b>Total</b>	<b>166</b>	<b>683,181</b>	<b>163</b>	<b>689,637</b>	<b>n/a</b>	<b>n/a</b>



## Corporate Contributions

Putting our charitable giving to work to educate, engage and empower communities around the world.

**“THE SUPPORT OF BLOOMBERG HAS ENABLED HUMAN RIGHTS FIRST TO ADVANCE HUMAN RIGHTS HERE AT HOME AND AROUND THE WORLD.”**

–ELISA MASSIMINO,  
PRESIDENT, HUMAN RIGHTS  
FIRST

**“WITHOUT BREAST CANCER RESEARCH FOUNDATION FUNDED RESEARCH, MANY FACTS ABOUT THE GENETIC BASIS OF BREAST CANCER WOULD NOT BE KNOWN.”**

–EVELYN H. LAUDER,  
FOUNDER AND CHAIRMAN,  
BREAST CANCER RESEARCH  
FOUNDATION

### CONFLICT AREAS

#### WORLDWIDE

**Human Rights First:** Protect human rights defenders, combat mass atrocities, bigotry and racism, and provide legal representation for asylum seekers.

**Women for Women International:** Job-skills training, business and money management basics and rights awareness for female survivors from war and conflict.

**Committee to Protect Journalism:** International Program Network responds to press freedom emergencies around the world.

#### International Women’s Media Foundation:

Campaign to strengthen women’s role in the global new media.

### A SECOND CHANCE

#### NEW YORK, LONDON

#### Local Initiatives Support Corporation

**Independence Starts First:** Housing, job placement for young people aging out of foster care.

**Osborne Association Fresh Start Culinary Arts Program:** Trains and hires formerly incarcerated men for jobs in the food industry.

#### Shannon Trust Toe to Toe Reading Plan:

Addresses illiteracy in prisons by enabling prisoners who can read to mentor those who cannot.

### EMPOWER & EMPLOY

#### NEW YORK, LONDON

#### Per Scholas Computer Technician Training

**Program:** Certifies disadvantaged, unemployed and under-employable adults as computer technicians.

**Room to Read:** Establishes libraries, reading rooms and local language books and literacy programs throughout the developing world.

### TECHNOLOGICAL INNOVATION

#### NEW YORK, LONDON

#### American Museum of Natural History’s Explorer:

Mobile app developed as an enhanced navigational tool with exhibition information.

**Tate Modern Tate Trumps App:** View collection through innovative gaming technology.

### PROTECT & CONSERVE

#### LONDON, U.S., TOKYO, AUSTRALIA

**Nature Conservancy:** United States Conservation Programs.

**Trees for Cities:** London International Tree Planting Program.

**Arakawa Clear Aid Forum:** Tokyo Arakawa River Clean Up.

**Sydney Botanical Gardens:** Support of four conservation spaces and international seed bank.

### HEALTH & WELLNESS

#### WORLDWIDE

**Breast Cancer Research Foundation:** Play for P.I.N.K. supports twelve research projects across the country.

**ARK:** Training program for health care workers to save mothers and newborns in Zimbabwe.

### ACCESS TO THE ARTS

#### WORLDWIDE

1.9 million students received in-school and after school arts education.

1.2 million museum visitors used hand-held audio guides at museums.

6 million people around the world attended free outdoor concerts, theater, dance performances, films, festivals and exhibitions.

### ARTS AROUND THE GLOBE

#### TOKYO, HONG KONG

**Hong Kong Youth Arts Foundation:** Emerging Artists Program supports exhibitions and residencies for emerging Asian artists.

#### Hara Museum of Contemporary Art, Tokyo:

Artist commissioned shuttle bus taking art into the community and new audiences to the museum.

# EMPLOYEES



# EMPLOYEES

Bloomberg relies on the dedication and inventive spirit of our employees. Their insights have enabled us to become the world's most trusted source of information for financial professionals and businesses.

To attract and retain top talent, we focus on creating a culture and work environment in which people build careers rather than climb ladders. Opportunities abound in our rapidly growing, entrepreneurial Company. Innovation is valued. Execution is expected. Exceptional performers are rewarded.

Our approach combines competitive rewards, an exceptional work environment, clear communication, and investment in training and development. We strive to offer a safe, secure, and inclusive workplace where difference is celebrated and innovation thrives.

Despite challenging economic conditions, Bloomberg's workforce increased by 23% between 2008 and 2010 to 12,690 employees. Our employee turnover rate in 2010 was 12.4%, compared with the average U.S. rate for the service sector of 20.5%.

# COMMUNICATION, CONSULTATION & POLICIES

Clarity. Transparency.  
Empowerment. Innovation.  
Bloomberg core values encourage creativity and ensure that employees understand the ground rules and context for success.

## Communication and Consultation

We use a number of channels to keep our employees informed about the business. These include:

- Quarterly reports from the Chairman and President
- Town Hall meetings
- Electronic messages (written and video)
- Employee-only functions on the Bloomberg Professional® service
- Written communications

An internal broadcast channel, ARCADE, keeps employees tuned in to what is going on in Bloomberg offices around the world. ARCADE introduces every new hire to the organization and provides an opportunity to recognize fellow employees for outstanding achievements. Live events, from guest speakers to nutritionists to jugglers, create a constant buzz and energy. The Bloomberg Terminal allows us to

communicate with employees using nontraditional vehicles that are fresh, exciting, and new.

At Bloomberg, we operate in a transparent environment where employees at all levels are encouraged to speak out and offer suggestions. In our unique work environment, no employee (not even the Chairman) has a private office. We sit shoulder to shoulder in a trading room-type environment that encourages open dialogue and collaboration.

Around 2% of our employees are covered by collective bargaining agreements.

## Policies

The Bloomberg Global Core Guide provides employees with information about their working conditions, benefits, and responsibilities. Supplements are provided to address specific local issues in numerous offices. The following categories are covered:

- General Professional Development Policies
- Employee Responsibilities
- Absences, Time Off, and Holidays
- Security, Facilities, and Equipment
- Employee Services
- Employee Benefits

Detailed global and regional policies are available to all employees and can be found in the Human Resources section of the Bloomberg Professional® service, HR<GO>.

# TRAINING & DEVELOPMENT

Our goal is to offer the training and development opportunities employees need to reach their full potential and enjoy fulfilling careers.

In addition to on-the-job training, we offer online and classroom leadership, professional skills development, and technical skills training through Bloomberg University, our online training portal.

We also provide tuition reimbursement to full-time employees for certain pre-approved, job-related courses. To qualify, employees must attain a grade of B or above. All employees receive regular performance and career development reviews.

## **COMPLIANCE TRAINING**

All new Bloomberg News employees attend intensive classes for a minimum of a week that include training on the Bloomberg Way, ethics and legal issues. All Bloomberg News employees attend media law classes conducted by our in-house attorney.

## **PERFORMANCE**

In 2010, we delivered 55 hours of training per employee (average cost per employee: \$1,075). The number of training hours per employee has increased every year since 2008, when it was 31 hours.

## **INSPIRING INNOVATION AND INFLUENCING THINKING**

The Innovators Speaker Series, launched in 2009, brings inspiring people to Bloomberg. Diverse speakers talk about innovation and client service, the outlook for the markets and the financial services industry, and their own strategies for personal and professional success.

Speakers have included:

- > **Tim Gill**, founder of Quark and well-known philanthropist focusing on the area of human rights and TLGB
- > **Matt Goldman**, founder of the Blue Man Group and advocate for arts, creativity and innovation, especially in public schools
- > **Jennifer Meehan**, CEO of Grameen Foundation, based in Hong Kong
- > **Aimee Mullins**, double-amputee athlete, actress and model who focuses on disability rights
- > **Sheryl Sandberg**, Chief Operating Officer at Facebook
- > **Fredrik Haren**, Hong Kong-based Swedish entrepreneur, publisher and author focusing on business creativity

# HEALTH, SAFETY & WELLNESS

Bloomberg is investing in benefits, programs, activities and initiatives that replenish employees' energy, helping them stay healthy and achieve a sense of well-being both on and off the job.

We believe that encouraging employees to lead a healthy lifestyle improves productivity and reduces absenteeism. As a largely office-based organization, the main health and safety risks to our people are stress- and ergonomic-related injuries.

The **HEALTH AND SAFETY** of our employees is our **TOP PRIORITY.**

Our worldwide Employee Assistance Program is a key support service for employees that includes on-site counseling at some locations. The program helps people address issues at work or at home that might interfere with their ability to do their job. In the U.K., we conduct stress risk assessments when required.

The Business Travel Program helps keep our employees safe and healthy when traveling on business. The program provides medical benefits abroad, accidental death and dismemberment insurance and certain travel expenses. In an emergency, employees can call a toll-free International SOS helpline that is available 24 hours a day, 7 days a week.

Through that service they can:

- Request emergency medical transportation and evacuation
- Get help locating hospitals or medical care
- Obtain health advice
- Get help replacing lost or stolen travel documents
- Receive translation services and referrals to local interpreters
- Get legal assistance
- Request a transfer of emergency funds

We conduct risk assessments and health and safety training globally that are matched to specific roles. For example, warehouse workers and field service engineers are trained in how to prevent injuries when handling objects. We provide ergonomics training to our office workers.

**BWELL**

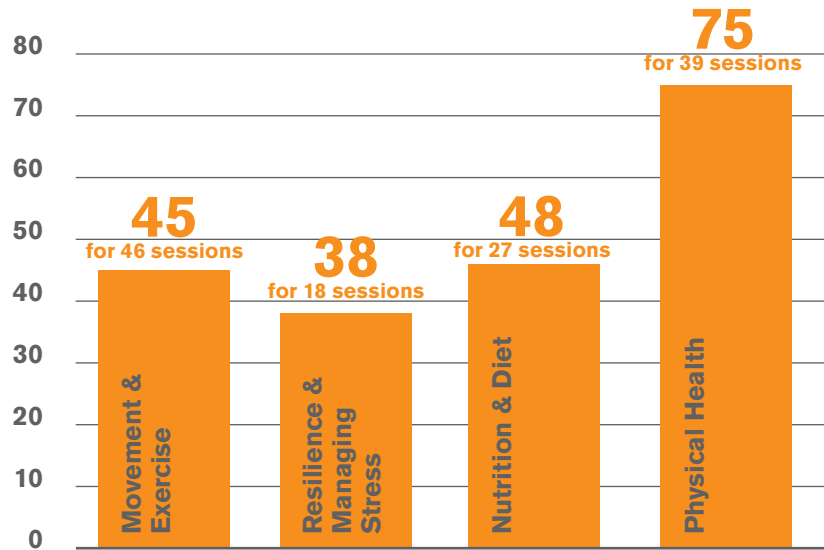
In 2010, we launched BWELL, a new program to improve the health and well-being of our employees and their families. BWELL uses innovative techniques to promote healthy living, preventive care, and positive mental health, with the aim of nurturing body and mind.

Bloomberg wellness programs include:

- New and expectant mother phase-back and return-to-work assessments and counseling.
- Seminars, lunch-and-learn sessions, and workshops that inform employees about general health topics, ways to stay fit and manage stress, including on-site yoga and meditation sessions, and clinics for runners and walkers.
- Wellness incentive programs covering smoking cessation, fitness and exercise, and health-risk assessments.
- Subsidized gym memberships and discounts on health and wellness equipment.
- A new ergonomics program that includes in-depth training followed by a self risk-assessment. Individual action reports resulting from this training will be used to help employees prevent ergonomic injuries.
- Pedometer challenges, weight loss challenges and on-site weight loss program.
- Intensive wellness “incubator” program provides intensive, individualized support to a select group of high-risk employees, helping them to achieve their wellness goals.
- Annual physicals, on-site screenings and preventive care (e.g., flu shots).
- Disease management program.
- On-site Health and Wellness Center including pharmacy concierge program.
- Lactation rooms and quiet rooms.
- Mammography program.
- Bike-to-Work program.
- Sports teams and leagues.

**AVERAGE ATTENDANCE PER BWELL SESSION**

New York Region



**KEY PERFORMANCE DATA FOR WELLNESS**

Global hits to internal website

**54,093**

Total number of health promotion events

**310**

Average number of attendees per session

**53**

Participation among U.S. employees

**37%**

**Total participation in all events**

**15,375**

**ENGAGING EMPLOYEES**

Meeting our environmental objectives depends to a large extent on engaging our employees in our BGREEN efforts.

We have developed a global BGREEN communications campaign to excite people about our environmental strategy and to encourage them to take steps to be more sustainable at work and at home. 2010 campaigns focused on sustainability themes of food, water and mobility. Our primary challenge is targeting our communications and engagement campaigns around topics that are relevant from a global perspective. Our goal is to influence behavioral change at work that employees can easily adapt at home.

Our commitment to sustainability helps us attract and retain talented people who are environmentally conscious. In 2009, we added sustainability information to recruitment materials and an “introduction to sustainability” module as part of the induction process for new hires. We are assessing the feasibility of introducing a carbon calculator for employee use – to raise awareness about how their actions at work contribute to Bloomberg’s carbon footprint.

Our internal awards program, Applause!, recognizes individual employees for their outstanding commitment and contributions to our sustainability, philanthropic and employee development efforts.

**BGREEN SURVEY RESULTS**

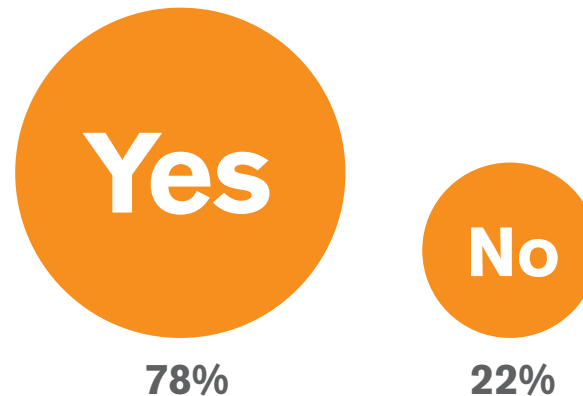
**When it comes to “Green” and sustainability issues, which of the following statements best describes you?**

**32%** { **“Sustainability is a value that factors strongly into my day-to-day activities.”**

**65%** { **“I do what I can but not to the extent that it negatively affects my life.”**

**3%** { **“Sustainability-related activities are not for me.”**

**Is BGREEN part of the Bloomberg culture?**





**PERFORMANCE**

In 2010, the rate of reportable incidents per 100 full-time employees was 0.91. The rate of lost-time incidents decreased slightly from 0.15 to 0.14. The U.S. industry average for reportable incidents is 1.9% and for lost-time incidents it is 0.6%.

During 2010, there were 354 days lost to injury, compared with 297 in 2009, but the rate of hours lost (per 200,000 hours worked) was 22.9, identical to 2009.

Bloomberg's reporting includes all employee/contractor incidents on company time, inside and outside company facilities, as well as visitor incidents (i.e., vendors) within Bloomberg facilities.

**REPORTABLE INCIDENTS**

Total And Per 100 Full-Time Employees

	North America		Latin America		Europe, Middle East & Africa*		Asia		Global	
	Total	Per 100	Total	Per 100	Total	Per 100	Total	Per 100	Total	Per 100
<b>2010</b>	29	0.36	2	0.77	82	2.77	4	0.24	<b>123</b>	<b>0.91</b>
<b>2009</b>	24	0.36	0	0.00	60	2.38	4	0.26	<b>88</b>	<b>0.82</b>
<b>2008</b>	28	0.44	0	0.00	46	1.97	8	0.55	<b>82</b>	<b>0.8</b>

**LOST-TIME INCIDENTS**

Total And Per 100 Full-Time Employees

	North America		Latin America		Europe, Middle East & Africa*		Asia		Global	
	Total	Per 100	Total	Per 100	Total	Per 100	Total	Per 100	Total	Per 100
<b>2010</b>	12	0.15	2	0.77	3	0.10	1	0.06	<b>18</b>	<b>0.14</b>
<b>2009</b>	12	0.20	0	0.00	4	0.16	0	0.00	<b>16</b>	<b>0.15</b>
<b>2008</b>	21	0.33	0	0.00	1	0.04	0	0.00	<b>22</b>	<b>0.21</b>

\* Europe, Middle East & Africa region has a higher incident rate due to broader, more inclusive definitions of reportable incidents.

# RECOGNITION & REWARDS

## Bloomberg aims to offer competitive compensation to attract and retain top talent.

We regularly benchmark our pay and benefit packages against our competitors.

Our compensation system is based on company and individual performance and includes a merit-based bonus plan. In a number of departments, sustainability goals and performance metrics are used in determining pay. Bloomberg pays significantly higher wages than the statutory local minimum wage at all locations.

All full-time and part-time employees who work 24 hours or more each week (except where the law requires less) are eligible for benefits, including:

- Health coverage (medical, prescription, dental and vision)
- Company retirement benefits
- Employee assistance program
- Back-up child care (U.S., U.K., Tokyo\*)
- On-site medical services (U.S., U.K., Tokyo\*)
- Basic life insurance
- Basic disability insurance
- Commuter programs (U.S., U.K., Tokyo\*)

### EMPLOYEE RECOGNITION PROGRAM

We recognize employees for their outstanding commitment to community service and the environment through our annual Applause! program. This celebrates employees who:

- Demonstrate exceptional passion, advocacy and commitment to philanthropy, the environment or mentoring their peers
- Make a measurable difference in achieving the goals of an organization or cause
- Serve as role models for others

### RECOGNIZING ACHIEVEMENT GLOBALLY

Our Applause! employee recognition program ceremony is held annually in all three major regions where we do business – the Americas, EMEA, and Asia Pacific.

In January, colleagues around the world nominate individuals and teams they think demonstrate a commitment and dedication to philanthropy, sustainability or peer mentoring. The program, driven by co-workers, drew nearly 800 nominations in categories such as “Biggest Carbon Footprint Reduction,” the “Shining Star” and the newly added award for mentoring, in-house teaching and recruiting.

The Applause! program centers on the areas of community service, charitable giving and sustainability. Globally, 42 awards are presented in 16 different categories at the ceremonies – highlighting the enthusiasm and hard work of those around our Company.

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\* Employees in U.S., U.K. and Tokyo represent 84% of total full-time employees.

# INCLUSION & DIVERSITY

A diverse workforce helps us innovate and develop products that meet the needs of our highly diverse customers around the world.

Our goal is to create an inclusive workplace where diversity of thought and perspective is valued by managers. This aligns with our values and is underlined by our Equal Employment Opportunity Policy.

We are extremely proud of our eclectic and open culture. We have nearly 13,000 employees in 73 countries – with major offices in New York, London, Tokyo, São Paulo, Dubai, Hong Kong, Singapore and Frankfurt.

We bridge all divides, united by one common passion: to provide the competitive edge to our clients. You will find this reflected in our core values as well as in our business results.

We value diversity in every form and encourage it at every level. Our inclusive environment makes reinvention a daily possibility and gives everyone room to thrive. We aim to hire employees locally so that we have local knowledge and expertise in the markets where we operate.

**CORE VALUES:** Clarity of Purpose, Open Communication, Empowerment of People, Spirit of Innovation.

## INTERNAL PROGRAMS & 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 and raise awareness of opportunities at Bloomberg. These relationships fall into three categories:

- Attending conferences and providing sponsorship to diversity organizations and cutting-edge research projects.
- Working with charitable organizations to source diverse interns.
- Working with organizations to source experienced candidates from underrepresented groups.

External sponsorships include:

- Asia Society's Asian Women's Leadership Summit.
- Forte Foundation, a consortium of major corporations and top business schools that help direct talented women toward leadership roles in business.
- Diversity in Asia Network (DIAN). In 2010, we attended the DIAN two-day conference in Singapore and hosted a follow-up seminar.
- Association of Women in Finance in Tokyo.
- IRelaunch, an organization focused on recruiting experienced female professionals who took time out of the workforce.
- Springboard Media, which offers programs that support women entrepreneurs seeking equity capital to grow their companies.

# INCLUSION & DIVERSITY

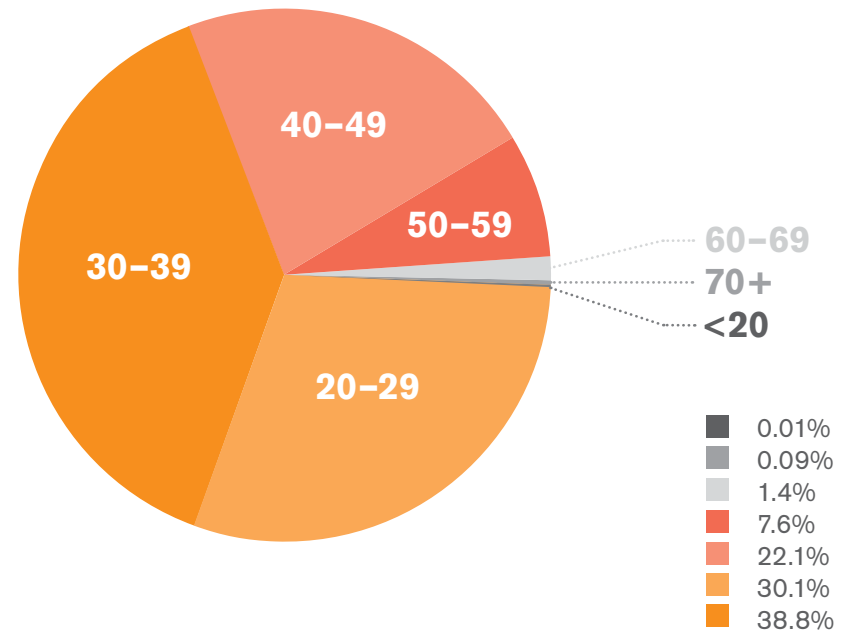
- Research on women’s leadership and women’s issues in the financial services industry through: Catalyst, National Council for Research on Women, White House Project, 85 Broads, 100 Women in Hedge Funds, Women’s Bond Club.
- Research on Women in Emerging Markets produced by the Center for Work-Life Policy and the Hidden Brain Drain Task Force.
- Targeted recruiting with news associations.
- National Association of Black Journalists.
- National Association of Hispanic Journalists.
- American Asian Journalists Association.
- South Asian Journalists Association.
- National Lesbian and Gay Journalists Association.

Internal initiatives include:

- Working Parents group in Tokyo.
- Maternity Mentoring contacts in each business serve as a resource and mentor for female employees about to take, or return from, maternity leave.
- Diversity Dialogue sessions, an interactive open forum to discuss how diversity and inclusion directly affect the day-to-day workplace.
- Inserting diversity and inclusion into our core curriculum, including an Interviewing Skills course in New York and London.
- Sponsoring attendance of high-potential women for an external women’s leadership program hosted by Women Unlimited.
- B-Discovered Day boot camp to expose students of diverse backgrounds to entry-level career opportunities. Seven of the 68 attendees were hired.

**LITIGATION:** The U.S. Equal Employment Opportunity Commission (EEOC) filed a lawsuit on September 27, 2007, alleging that Bloomberg engaged in a pattern of discriminatory practices from February 2002 to the present based on “sex/ pregnancy.” The EEOC identified 76 claimants on whose behalf it seeks recovery. Certain of those claims have been dismissed on statute of limitations grounds. On January 28, 2011, Bloomberg filed a motion for summary judgment on EEOC’s claim that it engaged in a “pattern or practice” of discrimination. Bloomberg vehemently denies EEOC’s allegations of discrimination and intends to continue to defend the case vigorously.

**EMPLOYEES BY AGE GROUP IN 2010**



# APPENDIX

The Appendix list is provided below. To view the Bloomberg 2010 Sustainability Report Appendix in its entirety, please download the complete report.

## **GRI Index** **3rd-Party Assurances**

### **SUSTAINABLE PRODUCTS & SERVICES**

ESG Survey  
Government Engagement on Related Issues  
12 Principles Bloomberg News  
Five Fs  
List of Awards – Journalism

### **ENVIRONMENTAL OPERATIONS**

List of Awards – Environmental  
CO<sub>2</sub>e Calculation Methodology  
All Environmental Policies  
List of Projects by Business Area  
Department Descriptions

### **SUPPLY CHAIN**

FSC Chain of Custody Certification  
Green Language in RFPs  
Green Language in Contracts  
Proprietary Product Audit  
Scrapper Certificate of Compliance  
Supplier Protocol of Ethical Behavior  
Scrapper/Recycler Questionnaire

### **EMPLOYEES**

General Standards of Conduct and Ethical Behavior  
Bloomberg Global Core Guide  
EEOC Policy  
Diversity Organization Affiliations

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First two Appendices listed are provided as part of the online viewer.

# GLOBAL REPORTING INITIATIVE INDEX

Where possible, we have provided information and data in response to indicators within this index. Much of this information can also be found within our report, along with explanatory information. Corresponding page numbers have been given. Some information is not available in the report, but additional disclosure is given in this index. We have referenced where this occurs throughout.

## PROFILE

Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
<b>STRATEGY AND ANALYSIS</b>								
1.1	Statement from the most senior decision maker of the organization (e.g., CEO, chair, or equivalent senior position) about the relevance of sustainability to the organization and its strategy.	Sustainability embodies Bloomberg's core values and provides competitive advantage – it is an employee and community engagement platform, an effective management tool and a substantial source of innovation and opportunity. –Peter Grauer, Chairman				Full	Pages 9-10	n/a
1.2	Description of key impacts, risks, and opportunities.					Full	Pages 9-10	n/a
<b>ORGANIZATIONAL PROFILE</b>								
2.1	Name of the organization.	Bloomberg L.P.				Full	This index	n/a
2.2	Primary brands, products, and/or services.	Bloomberg Professional* Service, Bloomberg Businessweek, Bloomberg TV, Bloomberg Markets*, Bloomberg Radio, Bloomberg Government, Bloomberg New Energy Finance				Full	Pages 6, 12, 21, 22, 23	n/a
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	Professional Development, Philanthropy and Sustainability and other corporate services all report directly to the Chairman. Products and Service report primarily to the President. Bloomberg does not have material subsidiaries or joint ventures. See organization chart for more details.				Full	Pages 14, 15; www.bloomberg.com/about	n/a
2.4	Location of organization's headquarters.	731 Lexington Avenue, New York, NY 10022				Full	This index	n/a
2.5	Number of countries where the organization operates:	73	69	65	–	Full	This index	n/a
	Names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	US, UK, Germany, Japan, China, Singapore, Australia, Hong Kong, Brazil, India						
2.6	Nature of ownership and legal form.	Bloomberg L.P. is a privately held Delaware USA Limited Partnership.				Full	This index	n/a
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	Financial institutions, governments and others with an interest in financial news, data and analytics globally.				Full	This index	n/a
2.8	Scale of Reporting organization, including: Number of Employees; Net sales (for private sector organizations) or net revenues (for public sector organizations); Total capitalization broken down in terms of debt and equity (for private sector organizations); Quantity of products or services provided (terminals).					Partial	This index	Bloomberg is a privately-held company and does not disclose full financial data
	Employees	12,690	10,990	10,317	–			
	Revenue	\$6.9 billion	\$6.3 billion	\$6.1 billion	–			
	Terminals	300,101	279,171	285,896	–			



Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
2.9	Significant changes during the reporting period regarding size, structure, or ownership including: The location of, or changes in, operations, including facility openings, closings, and expansions; Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organizations).	Bloomberg L.P. has been a privately held Limited Partnership since its inception. Bloomberg L.P. acquired Businessweek and New Energy Finance (NEF) in December of 2009, with almost immediate assimilation of operations into Bloomberg's existing structure.				Full	This index	n/a
2.10	Awards received in reporting period (News, EPA, LEED):	22	11	15	–	Full	This index; Report Appendix	n/a

## REPORT PARAMETERS

Report Profile								
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	Calendar				Full	This index	n/a
3.2	Date of most recent previous report (if any).	Bloomberg's 2010 Sustainability Report is the first released report.				Full	This index	Not material
3.3	Reporting cycle (annual, biennial, etc.).	Annual				Full	This index	n/a
3.4	Contact point for questions regarding the report or its contents.	Curtis Ravenel, Bsustainable@bloomberg.net				Full	This index	n/a
Report Scope and Boundary								
3.5	Process for defining report content, including: Determining materiality; Prioritizing topics within the report; Identifying stakeholders the organization expects to use the report; Include an explanation of how the organization has applied the 'Guidance on Defining Report Content' and the associated Principles.	Bloomberg consulted the guidance provided by the G3 Online. For an information services company, environmental impact is principally driven by energy consumption. Bloomberg expects all interested stakeholders – owners, customers, vendors, employees, communities, NGOs and government agencies – to use the report.				Full	Pages 11, 17	n/a
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers) See GRI Boundary Protocol for further guidance.	The Boundary setting includes Control AND Significant Influence BLP global operations and material supplier activities are addressed.				Full	This index; Page 5	n/a
3.7	State any specific limitations on the scope or boundary of the report.	None				Full	This index	n/a
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	All joint ventures, subsidiaries and leased facilities are included. Outsourced operations, while not included in the environmental footprint, are subject to significant sustainability program requirements. See Appendix for vendor guidelines.				Full	This index; Page 5	n/a
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report.	See Methodology Documents in Appendix.				Full	Page 38	n/a
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	Bloomberg's 2010 Sustainability Report is the first released report.				Full	This index	n/a
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	No significant changes to applicable boundaries (operational), scope or measurement methodology. Only very minor changes to calculations were employed (i.e. GHG factor changes).				Full	This index; Page 43	n/a
GRI Context Index								
3.12	Table identifying the location of the Standard Disclosures in the report.					Full	This index	n/a
Assurance								
3.13	Policy and current practice with regard to seeking external assurance for the report. If not included in the assurance report accompanying the sustainability report, explain the scope and basis of any external assurance provided. Also explain the relationship between the reporting organization and the assurance provider(s).	Bloomberg contracts with a 3rd-party (Cventure) to validate our annual GHG Emissions. Summary pages of Assurance reports for 2007 - 2010 are attached.				Full	This index; Pages 5, 31; Report Appendix	n/a



Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
<b>GOVERNANCE, COMMITMENTS, &amp; ENGAGEMENT</b>								
<b>Governance</b>								
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	Board of Directors operates the company, with representatives from each division reporting into the Chairman.				Partial	This index; www.bloomberg.com/about/management	n/a
4.2	Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organization's management and the reasons for this arrangement).	Yes. The Chairman of the Board (Peter Grauer) and President (Dan Doctoroff) are the highest officers and serve these roles at the request of the owner.				Full	Page 6	n/a
4.3	For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.					Full	This index	n/a
	Total	11	11	11	–			
	Independent	3	3	3	–			
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Employees can submit recommendations to directors of the highest governance body in their name and anonymously via phone through an Anonymous Hotline. Bloomberg is a privately-held company, so no such mechanism exists for shareholders.				Full	This index	n/a
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).	Bloomberg has a compensation system that is based on performance of the company and the individual, including a merit-based bonus plan. Departmental managers and team members in high environmental impact departments have specific sustainability targets tied to their bonus.				Full	This Index	n/a
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	–				No	n/a	Information not public
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics.	A department dedicated to sustainability reports directly into the Chairman of the Board. A Steering Committee comprised of senior managers across departments guides firm-wide sustainability initiatives.				Full	This index; Pages 14, 15	n/a
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	BLP has developed a very aggressive Sustainability program. We will reduce our carbon footprint 50% by 2013 through energy efficiency, increased renewable resource use and aggressive waste reduction strategies. As an extension of our continued commitment to the communities in which we work, we engage our employees, vendors and customers in setting standards, promoting clean technologies and improving natural resource utilization across departments and regions.				Full	This index; Pages 18, 24, 29, 50, 68; Report Appendix	n/a
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	Professional Development, Philanthropy and Sustainability Departments review policies and procedures around these issues to ensure compliance with all relevant internationally agreed principles.				Full	This index	n/a
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	As a privately held company, the processes for evaluation are embedded in the owner-governance body relationship.				Full	This index	
<b>Commitment to External Initiatives</b>								
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	The precautionary principle is addressed by the organization through its Sustainability Initiative and the associated guidelines managing departmental and regional operations. See Appendix.				Full	This index; Report Appendix	n/a
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	Bloomberg is a member of and an active supporter of numerous environmental and social advocacy groups.				Full	This index; Pages 16, 31, 35, 42, 50, 52, 53, 75; Report Appendix	n/a





Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: Has positions in governance bodies; Participates in projects or committees; Provides substantive funding beyond routine membership dues; Views membership as strategic.	See Appendix (xiv) – Boards & Affiliations Table Bloomberg considers information regarding funding of and strategic relationships with advocacy organizations to be proprietary.				Partial	n/a	Information not public
<b>Stakeholder Engagement</b>								
4.14	List of stakeholder groups engaged by the organization. Examples of stakeholder groups are: communities; civil society; customers; shareholders and providers of capital; suppliers; employees, other workers, and their trade unions.	A department dedicated to sustainability reports directly into the Chairman of the Board. A Steering Committee comprised of senior managers across departments guides firm-wide sustainability initiatives.				Full	This index; Page 16	n/a
4.15	Basis for identification and selection of stakeholders with whom to engage.	Our engagement is broad as a news organization and direct/targeted engagement is aggressive at the employee, operating department, vendor and customer level. Our materiality process helps us define the stakeholder groups with whom we engage. Bloomberg collaborates with organizations that are aligned with core business operating issues and our corporate philosophy.				Full	This index; Pages 16, 17	n/a
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	Integrate sustainability metrics into compensation program for depts. with large impact; training for employees; visible action by corporate; vendor ratings; customer education risks/opportunities; employee communication including quarterly town hall meetings, corporate emails, surveys and other engagement; vendor communication including an annual environmental performance survey and remedy for poor performers; press releases advising of important corporate news and updates.				Full	Pages 15, 58, 68, 72	n/a
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	Highlights of Stakeholder Feedback: Private company leadership, Develop the ESG product, Educate customers on sustainability issues, demonstrate ROI, be more active in public policy, integrate social issues, focus on diversity, tie compensation to ESG, set long term and measurable goals, align with 3rd parties for supply chain work. Feedback gained from employee communication is integrated into strategy and used for future reference. Annual environmental performance results are compared year-over-year to identify trends and opportunities.				Full	Pages 16, 59, 72	n/a

## PERFORMANCE INDICATORS

### ECONOMIC

Economic Performance								
EC1	Economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	Gross Revenue information presented in 2.8 above. As a private firm, we do not disclose further information.				Partial	This index; Indicator 2.8	Information not public
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	BLP completed the CDP questionnaire and determined that there are small risks (access and cost of energy) to its organization due to climate change, but significant opportunities around investment products.				Full	This index; Pages 10, 20, 21, 22	n/a
EC3	Coverage of the organization's defined benefit plan obligations.	Bloomberg does not have a defined benefit program.				Full	n/a	n/a
EC4	Significant financial assistance received from government.	Bloomberg has never received assistance from governments.				Full	n/a	n/a
Market Presence								
EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation.	Bloomberg pays significantly higher than local minimum wage at all locations.				Not reported	n/a	Not material
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	No specific policy, but in practice we seek to buy locally when and where it makes sense. We consider the environmental impact of transportation as well as production processes and other quality issues.				Partial	n/a	No official policy
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	No specific policy exists but local hiring is preferred as markets are local.				Not reported	n/a	No official policy in place



Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
<b>Indirect Economic Impacts</b>								
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	BLP is an information service. While much of the data, news and analytics is proprietary and accessible only to customers, much of it is publicly available via the website, TV, Radio, Magazine and Press. We have significant influence in capital markets due to our distribution.				Partial	This index; Pages 20, 21, 22, 23, 24, 25, 26	n/a
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	As a privately held company, BLP does not disclose detailed financial information. However, the purchasing power Bloomberg manages and leadership role it plays in the financial community creates indirect economic impact.				Not reported	n/a	Information not public
<b>Materials</b>								
EN1	Materials used by weight or volume.	We will have this data next year.				Not Reported	n/a	Information not collected
EN2	Percentage of materials used that are recycled input materials.	0%	0%	0%	0%	Full	n/a	n/a
<b>Energy</b>								
EN3	Direct energy consumption - Natural Gas (GJ)	35,627	33,139	42,629	14,522	Full	This index; Page 33	n/a
	Direct energy consumption - Diesel Oil (GJ)	14,680	11,415	8,015	8,711			
	Direct energy consumption - HFC (Lbs)	668	457	78	-			
	Direct energy consumption - Aircraft Fuel (GJ)	43,522	33,535	30,751	19,617			
EN4	Indirect energy consumption by primary source (kWh consumed)	241,669,809	231,668,327	239,108,901	234,706,352	Full	This index; Page 33	n/a
	Indirect energy consumption by primary source (mlbs steam)	10,662	13,197	22,783	27,773			
EN5	Energy saved due to conservation and efficiency improvements (kWh saved from projects)	25,587,306	17,262,253	15,990,157	-	Full	This index; Pages 31, 32, 33, 34	n/a
	Energy saved due to conservation and efficiency improvements (GJ of natural gas saved from projects)	6,981	7,146	3,490	-			
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	By upgrading its flat panels to Energy Star Standards, Bloomberg will be increasing the efficiency of this equipment by an average of 8%. Internally this has a potential of eliminating 15,500 kWh annually and 44,200 kWh annually spread across our entire customer base.				Full	This index; Pages 52, 53	n/a
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	Bloomberg has done an extensive review of our global energy usage at our major facilities, including energy audits at our NY Headquarters, Princeton Campus, both Data Centers and our Hong Kong office (collectively representing 67% of our global portfolio). We have implemented a number of global energy-demand-reduction initiatives as well as completed many facility-specific infrastructure projects throughout our portfolio. EN5 shows the energy reductions associated with these efforts.				Full	This index; Pages 31, 33, 34, 35	n/a
<b>Water</b>								
EN8	Total water withdrawal by source (Municipal)	81,395,625	71,919,250	67,683,875	-	Full	This index	n/a
EN9	Water sources significantly affected by withdrawal of water.	Bloomberg's water consumption is not materially high, therefore no water sources are significantly affected.				Not reported	n/a	Not material
EN10	Percentage and total volume of water recycled and reused.	0%	0%	0%	-	Full	This index	n/a
<b>Biodiversity</b>								
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Two Bloomberg sites contain protected wetlands: 100 and 101 Business Park Drive Skillman, NJ (84.68 acres) and 431 Ridge Road Dayton, NJ (64.81 acres)				Full	This index	n/a
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	No facilities are in an area of high biodiversity.				Not reported	n/a	Not material



Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
EN13	Habitats protected or restored.	We manage our activities to comply with local zoning laws to not disturb adjacent wetlands. To date we have not encroached on any such habitat and therefore have had no occasion to either "protect" or "restore" such habitats.				Full	This index	n/a
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	Our operations do not directly impact biodiversity. However, we own two magazines and therefore work closely with FSC and the Rainforest Alliance to ensure properly sourced paper.				Not reported	n/a	Not material
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	No facilities are in an area presenting risks to these species.				Not reported	n/a	Not material
<b>Emissions, Effluents, &amp; Waste</b>								
EN16	Total direct greenhouse gas emissions by weight (Scope I) (MT)	5,961	4,864	4,671	2,619	Full	This index; Pages 5, 32, xvi	n/a
	Total indirect greenhouse gas emissions by weight. (Scope II) (MT)	98,311	94,216	101,850	102,524			
EN17	Other relevant indirect greenhouse gas emissions by weight. (Scope III) (MT)	89,305	42,008	42,049	44,357	Full	This index; Pages 5, 32, xvi	n/a
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	<p>In addition to the energy reduction initiatives in EN7, we have undertaken initiatives in other operational areas to reduce our GHG emissions, including:</p> <ul style="list-style-type: none"> <li>&gt; Engineering has reduced the weight of the Bloomberg Keyboard and the packaging, significantly reducing the overall shipping weight.</li> <li>&gt; Sales Department introduced travel guidelines pushing public transportation in lieu of Car Service and Rail travel instead of Air on heavily-traveled short routes.</li> <li>&gt; Global pantry initiatives incorporating compostable cups/wares and bulk food/drink offerings to reduce landfill waste and increase waste "diversion" (composting/recycling).</li> <li>&gt; Increase in recycled content of office paper and Markets magazine.</li> <li>&gt; Shift from air shipments to ground/sea shipments in global logistics.</li> </ul> <p>While all the above initiatives, and more, reduce Bloomberg's GHG emissions, the company has experienced significant growth in recent years. We projected unabated emissions based on these growth factors, and calculate our overall emissions reductions to be the difference between these projections and our actual emissions. Those differences (i.e. our annual reductions), in metric tonnes, were:</p>				Full	This index; Pages 31, 33, 34, 35, 36, 38, 40	n/a
	Reductions against "Business-As-Usual" 2007 Baseline (MT)	40,492	30,810	12,551	0			
EN19	Emissions of ozone-depleting substances by weight.	Bloomberg does not hold ozone-depleting substances.				Not reported	n/a	Not material
EN20	NOx, SOx, and other significant air emissions by type and weight.	Bloomberg has minimal Scope and therefore immaterial amounts of other emissions.				Not reported	n/a	Not material
EN21	Total water discharge by quality and destination.	Bloomberg does not discharge significant amounts of water.				Not reported	n/a	Not material
EN22	Total weight of waste by type and disposal method:					Full	This index; Page 39	n/a
	Landfill Waste (MT)	1,881	1,936	2,144	2,256			
	Recycling & Compost (MT)	2,244	1,867	1,599	–			
	E-Waste (MT)	488	508	558	–			
EN23	Total number and volume of significant spills.	Bloomberg has not been involved in any spills.				Not reported	n/a	Not material
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	0	0	Hazardous Waste in pounds: 4,744	–	Full	This index	n/a
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	Bloomberg does not discharge significant amounts of water.				Not reported	n/a	Not material



Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
<b>Products &amp; Services</b>								
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	Have developed Engineering Product Guidelines. These Guidelines are devoted to 4 specific areas to reduce the environmental impact of our products. They are: Chemicals & Waste Criteria (toxics reduction, chemicals mgmt., RoHS compliance), E-Waste Criteria (Individual Producer Responsibility), Energy Criteria (Energy Star Compliance), Product Longevity (Design for End of Life).				Full	This index; Pages 52, 53, 54, 55	n/a
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.					Full	This index; Page 53	n/a
	Products "Sold" (terminals)	100%	100%	100%	100%			
	Packaging recovered (terminals)	50%	50%	0%	0%			
<b>Compliance</b>								
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	0	0	0	0	Full	This index	n/a
<b>Transport</b>								
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.					Full	This index; Page 32	n/a
	Transport of Product/Goods (MT CO <sub>2</sub> e) including magazines	24,109	8,773	9,643	11,370			
	Business Travel (MT CO <sub>2</sub> e)	33,695	26,054	24,011	23,274			
<b>Overall</b>								
EN30	Total environmental protection expenditures and investments by type. (Includes capital and operating, excludes employee allocation):	\$3,464,184	\$3,614,465	\$1,580,047	–	Partial	This index	n/a

## SOCIAL PERFORMANCE: LABOR PRACTICES & DECENT WORK

<b>Employment</b>								
LA1 At Year-End	Total workforce by employment type, employment contract, and region.					Full	This index; Pages 8, 12; Indicator 2.8	n/a
	FT Employees - North America	7,735	6,683	6,065	–			
	FT Employees - Latin America	236	209	207	–			
	FT Employees - EMEA	2,958	2,541	2,542	–			
	FT Employees - Asia	1,761	1,557	1,503	–			
	Non-FT Employees - North America	1,025	783	507	–			
	Non-FT Employees - Latin America	20	17	15	–			
	Non-FT Employees - EMEA	360	229	110	–			
Non-FT Employees - Asia	141	114	103	–				
LA2	Total number and rate of employee turnover by age group, gender, and region.	Not externally reported.				Not reported	n/a	Information not public
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	Bloomberg provides benefits without charge to full- and part-time employees who work 24 hours or more per week, including health coverage (medical, dental and vision), company matched retirement benefits, EAP, back up child care, on-site medical services, basic life insurance, basic LTD. Temporary employees are not eligible for benefits.				Full	This index; Pages 70, 71	n/a



Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
<b>Labor/Management Relations</b>								
LA4	Percentage of employees covered by collective bargaining agreements.	100% of Bloomberg's employees in France and Brazil are covered by collective bargaining agreements. The percentage of Bloomberg's employee base this represents is:				Full	This index	n/a
		1.65%	1.86%	1.95%	–			
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	Bloomberg does not have minimum notice periods regarding significant operational changes.				Not reported	n/a	Not material
<b>Occupational Health and Safety</b>								
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	0%	0%	0%	–	Full	This index	n/a
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region:					Full	This index; Pages 12, 73	n/a
	Incident Rate - North America	0.36%	0.36%	0.44%	–			
	Incident Rate - Latin America	0.77%	0.00%	0.00%	–			
	Incident Rate - EMEA	2.77%	2.38%	1.97%	–			
	Incident Rate - Asia	0.24%	0.26%	0.55%	–			
	Lost-Time Incident Rate - North America	0.15%	0.18%	0.33%	–			
	Lost-Time Incident Rate - Latin America	0.77%	0.00%	0.00%	–			
	Lost-Time Incident Rate - EMEA	0.10%	0.16%	0.04%	–			
	Lost-Time Incident Rate - Asia	0.06%	0.00%	0.00%	–			
	Total Lost-Time Days - Global	354	297	347	–			
	Lost Hours per 200,000 Hrs Worked - Global	22.93	22.92	28.14	–			
	Total Global Fatalities	1	0	0	–			
Global Absenteeism Rate	1.59%	1.79%	1.92%	–				
Occupational Diseases	No occupational diseases identified globally.							
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	We have significant programs addressing all of these issues. See Report.				Full	This index; Page 71	n/a
LA9	Health and safety topics covered in formal agreements with trade unions.	Bloomberg does not have formal agreements with trade unions.				Not reported	n/a	Not material
<b>Training and Education</b>								
LA10	Average hours of training per year per employee by employee category (Total Hours)	703,448	435,940	321,312	–	Partial	This index; Page 13, 70	n/a
	Training Hours per employee	55.43	39.67	31.14	–			
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	Bloomberg provides tuition reimbursement to full-time employees for certain pre-approved, job-related courses. To receive tuition reimbursement for any course(s), the employee must receive a grade of B or better. All employees have access to Bloomberg University, which offers online and classroom training in both technical skills and career development.				Full	This index; Page 69	n/a
LA12	Percentage of employees receiving regular performance and career development reviews.	100%	100%	100%	–	Full	This index	n/a



Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
<b>Diversity and Equal Opportunity</b>								
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.					Partial	This index; Pages 12, 76	n/a
	Governance bodies – Board	Male: 10 Female: 1	10 1	10 1	–			
	Gender	Not externally reported.						
	Age group:							
	<29	30.10%	27.50%	28.79%	–			
	30 – 49	60.83%	62.83%	62.62%	–			
	>50	9.07%	9.67%	8.59%	–			
Minority	Not externally reported.							
LA14	Ratio of basic salary of men to women by employee category.	Not externally reported.				Not reported	n/a	Information not public

## SOCIAL PERFORMANCE: HUMAN RIGHTS

<b>Investment and Procurement Practices</b>								
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	Bloomberg does not have agreements that include human rights clauses or have undergone human rights screening.				Not reported	n/a	Not material
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	Our Quality Assurance team, supported by a third-party organization, audits significant suppliers - since 2009 they audited 4 companies in China that supply parts for our customer facing equipment.				Partial	Page 59	n/a
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	All employees receive mandatory training in Harassment, Sensitivity and General Health and Safety. Employees can also take additional courses relating to human rights issues through Bloomberg University.				Partial	This index; Pages 18, 69	n/a
<b>Non-Discrimination</b>								
HR4	Total number of incidents of discrimination and actions taken.	EEOC filed suit for 'sex/pregnancy' discrimination on behalf of 76 claimants. Bloomberg denies those charges.				Partial	Page 76	n/a
<b>Freedom of Association and Collective Bargaining</b>								
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	None	None	None	–	Full	This index; Page 18	n/a
<b>Child Labor</b>								
HR6	Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor.	Premium Products sourced in Asia and e-waste operations have been identified as having possible exposure to child labor. Procurement policies have been updated accordingly and e-waste audits were conducted in 2010 will be conducted annually going forward.				Partial	This index	n/a
<b>Forced and Compulsory Labor</b>								
HR7	Operations identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of forced or compulsory labor.	Premium Products sourced in Asia and e-waste operations have been identified as having possible exposure to forced and compulsory labor. Procurement policies have been updated accordingly and we conduct social responsibility audits of our equipment manufacturers to assess labor standards.				Full	This index; Page 18	n/a
<b>Security Practices</b>								
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	100%	100%	100%	–	Full	This index; Page 18	n/a



Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
<b>Indigenous Rights</b>								
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	0	0	0	–	Full	This index	n/a
<b>SOCIAL PERFORMANCE: SOCIETY</b>								
<b>Community</b>								
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	We've reviewed our operations and due to our presence in urban areas, our consistent and long term growth and our relatively low environmental impact, we have no related material issues to report.				Not reported	n/a	Not material
<b>Corruption</b>								
SO2	Percentage and total number of business units analyzed for risks related to corruption.	100%	100%	100%	–	Full	This index	n/a
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	Bloomberg's anti-corruption policies and procedures are set forth in the company's Global Resource and Information Core Guide. All employees receive a copy of this Guide when they commence employment and are required to sign a consent form acknowledging that they have read the Guide and will abide by its contents. In addition, each employee is reminded of Bloomberg's "no gifts" policy on at least an annual basis.				Full	This index; Page 18	n/a
SO4	Actions taken in response to incidents of corruption.	There have been no instances of corruption.				Not reported	n/a	Not material
<b>Public Policy</b>								
SO5	Public policy positions and participation in public policy development and lobbying.	Bloomberg does participate in public policy development on issues of disclosure and transparency. See Appendix.				Not reported	n/a	Not material
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	Bloomberg does not make political contributions.				Not reported	n/a	Not material
<b>Anti-Competitive Behavior</b>								
SO7	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	0	0	0	–	Full	This index	n/a
<b>Compliance</b>								
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	0	0	0	–	Full	This index	n/a
<b>Customer Health and Safety</b>								
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	100%	100%	100%	–	Full	This index; Pages 52, 53, 54, 55, 56, 57	n/a
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	None	None	None	–	Full	This index	n/a
<b>Products and Service Labeling</b>								
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	None	None	None	–	Full	This index	n/a
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	None	None	None	–	Full	This index	n/a
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	75% of users agree or strongly agree that if they could only have one source of financial information, it would be Bloomberg.				Full	This index; Page 16	n/a



Indicators	Description	Performance Response				Reported	Cross Reference	Reason for Omission
		2010	2009	2008	2007			
<b>Marketing Communications</b>								
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	PRSA is the U.S. Industry Group and we follow their code of ethics.				Full	This index	n/a
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	0	0	0	–	Full	This index	n/a
<b>Customer Privacy</b>								
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	0	0	0	–	Full	This index	n/a
<b>Compliance</b>								
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	0	0	0	–	Full	This index	n/a

**THE G3 DISCLOSURE TEXT IN THE CONTENT INDEX IS NOT EXACT AND THAT THE USER CAN ACCESS THE FULL G3 GUIDELINES VIA [WWW.GLOBALREPORTING.ORG](http://WWW.GLOBALREPORTING.ORG)**



# MANAGEMENT APPROACH

Disclosures on Management Approach	Reported	Cross Reference	Reason for Omission
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## ECONOMIC

Throughout Bloomberg's 29 year (1982-2011) history, we've continued to grow – from 22 terminals at one brokerage firm to over 300,000 terminals at more than 25,000 firms; from a single product to multiple businesses in media, data and trading systems; and from \$500k in sales to potentially \$10B in 2014.

Economic Performance	Partial	Pages 9, 10, 14, 20, 21, 23, 25	n/a
Market presence	Full	Pages 7, 8	n/a
Indirect economic impacts	Partial	Pages 20, 21, 22, 23, 24, 25, 26	n/a

## ENVIRONMENTAL

Materials	Full	Pages 52, 53, 54, 55	n/a
Energy	Full	Pages 31, 33, 34, 35, 36	n/a
Water	Full	Pages 43	n/a
Biodiversity	Full	This index EN13	n/a
Emissions, effluents and waste	Full	Pages 31, 33, 34, 35, 36, 37, 40	n/a
Products and Services	Full	Pages 52, 53, 54, 55	n/a
Compliance	Full	Page 14	n/a
Transport	Full	Pages 31, 36	n/a
Overall	Full	Pages 28-48	n/a

## SOCIAL PERFORMANCE: LABOR PRACTICES & DECENT WORK

Employment	Full	Pages 68-76	n/a
Labor/management relations	Full	This index LA4	n/a
Occupational health and safety	Full	Pages 70, 71, 72, 73	n/a
Training and education	Full	Page 69	n/a
Diversity and equal opportunity	Full	Page 75	n/a

## SOCIAL PERFORMANCE: HUMAN RIGHTS

Bloomberg's operations do not source materially from regions with indigenous peoples.

Investment and procurement practices	Full	Page 67	n/a
Non-discrimination	Full	Page 18	n/a
Freedom of association and collective bargaining	Full	Page 18	n/a

Disclosures on Management Approach	Reported	Cross Reference	Reason for Omission
Child labor	Full	Page 18	n/a
Forced and compulsory labor	Full	Page 18	n/a
Security practices	Full	Page 18	n/a
Indigenous rights	Not reported	n/a	Not material

## SOCIAL PERFORMANCE: SOCIETY

Community	Full	Page 61	n/a
Corruption	Full	Page 18	n/a
Public policy	Full	This index SO5	n/a
Anti-competitive behavior	Full	Page 18	n/a
Compliance	Full	Page 14	n/a

## SOCIAL PERFORMANCE: PRODUCT RESPONSIBILITY

Bloomberg customer agreements include a highly restrictive mutual Non-Disclosure Agreement that protects the mutual privacy right of the firm and its customers.

Customer health and safety	Full	Pages 52-57	n/a
Product and service labeling	Full	Pages 20-27, 52-57	n/a
Marketing communications	Full	This index PR6	n/a
Customer privacy	Full	This index (see comment above)	n/a
Compliance	Full	This index PR6; Page 14	n/a

# BOARDS & AFFILIATIONS

Employee	Department	Organization	Position
Greg Babyak	Policy	NetCoalition	Board Member
		Security Industry and Financial Markets Association - Market Data Subcommittee	Co-Chair
		Security Traders Association - Institutional Brokerage Committee	Member
		US Chamber of Commerce - Intellectual Property Committee	Member
Dan Doctoroff	President	Bloomberg L.P.	Board Member
		Committee Encouraging Corporate Philanthropy	Board Member
		Council on Foreign Relations	Member
		Governor's Island Preservation and Education Corporation	Vice Chair
		Hudson River Park Trust	Board Member
		Hudson Yards Development Corporation	Board Member
		Human Rights First	Board Member
		Youth Inc.	Board Member
World Resources Institute	Board Member		
Peter Grauer	Chairman	Bloomberg Inc	Chairman
		Bloomberg L.P.	Board Member
		Davita Inc	Lead Director
		Davita Inc - Compensation	Member
		Davita Inc - Compliance	Member
		Davita Inc - Nominating & Corp Governance	Chairman
		Foundation Board for UNC Chapel Hill	Member
		Honors Board for UNC Chapel Hill	Member
		International Business Council of The World Economic Forum	Member
		Inner City Scholarship Fund Board of Trustees	Trustee/President
		National Development Council for UNC Chapel Hill	Member
		Pomfret School Board of Trustees	Trustee/President
		Rockefeller University	Trustee
		The Business Council	Member/Executive Committee Member
		US Chamber of Commerce	Board Member
Andy Lack	Multimedia	Boston University	Trustee
		IMG	Board Member
		Planet Green	Advisory Council
		Readers Digest Association Inc	Board Member
		Sezmi Inc.	Board Member
		Sony BMG	Chairman
		Sony Music Entertainment Inc	Chairman



Tom Secunda	Product	Bloomberg L.P.	Board Member
		Governor's Island Alliance	Board Member
		Intrepid Museum Foundation	Board Member
		National Parks Conservation	Vice Chair
		Nature Conservancy	Board Member
		Westchester County Parks, Recreation & Conservation Board	Member
Matt Winkler	News	Bloomberg L.P.	Board Member
		City University of New York Graduate School of Journalism	Member
		Columbia College Board of Visitors of Columbia University	Member
		Columbia University Knight-Bagehot Fellowship Program, Board of Advisors	Chairman
		Committee To Protect Journalists	Member
		Council on Foreign Relations	Board Member
		Economic Club of New York	Member
		International Center for Journalists	Board Member
		Kenyon College	Trustee
		Kenyon Review Board of Trustees	Trustee
		School of Journalism & Communication-Tsinghua Univ, Advisory Board	Member
		Tsinghua University School of Journalism, International Board	Board Member

## CVENTURE VERIFICATION STATEMENT

2010


**Bloomberg LP**  
**Verification Summary**
**Cventure LLC**  
**March 22, 2011**

Name:	Bloomberg LP (BLP)
Prepared by:	Kevin Johnson, Cventure LLC
Emissions Inventory:	<p>Global, corporate-wide FY2010 GHG emissions inventory covering: Scope I direct emissions from fuel combustion, mobile sources (company aircraft), and refrigerant losses; Scope II emissions from total imported electricity and steam; and Scope III emissions associated with employee business travel, supply chain shipping, and paper consumption/waste generation. Boundaries include wholly owned business entities, and owned/leased facilities within which Bloomberg exhibits operational control. CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O direct combustion and electricity generation emissions and HFC refrigerant gas emissions were estimated; CH<sub>4</sub> and N<sub>2</sub>O emissions from mobile source combustion emissions were excluded; and BLP has no SF<sub>6</sub> or PFC emissions.</p>
Greenhouse Gas Management Plan:	<p>BLP 2009 Carbon Emissions Calculation Process (CECP) document (Version 3.0, dated June 4, 2010) developed internally by Bloomberg, to both calculate Bloomberg's carbon emissions, and support the development of an aggressive GHG emissions reduction strategy.</p>
Verification Level of Effort:	<p>Tier II: A Tier II-level verification is appropriate for basic reporting, and those voluntary efforts for which there are no imminent requirements for compliance obligations or emissions trading. This is the case for BLP, as direct GHG emissions from each of BLP's facilities are well below any existing (or pending) GHG regulatory requirements. It is intended to establish the basis for baseline protection; support claims of carbon neutrality, and for credit for early action; and enable assessments of performance of various GHG reduction initiatives by Bloomberg toward its future voluntary targets. Given the status of Bloomberg's GHG emissions inventory and management system, and system improvements made by Bloomberg in 2010 and going forward (e.g., further development and implementation of the automated Business Warehouse database system for carbon management at BLP), a Tier II-level verification was appropriate for this project. This verification effort covered Bloomberg's FY2010 GHG emissions inventory.</p>
Summary:	<p>Based on its review of BLP's GHG emissions inventory, Cventure has verified the information submitted by BLP as being consistent with the Bloomberg Carbon Emissions Calculation Process (CECP) emissions methodology and reporting guidance document, Version 3.0, dated June 4, 2010. Cventure finds that the 2010 (January 1, 2010 – December 31, 2010) inventory emissions estimate conforms to generally accepted GHG accounting standards. BLP's CECP document is based upon, and was found to be generally consistent with, the WRI/WBCSD GHG accounting and reporting protocol, and the WRI report, "Hot Climate, Cool Commerce: A Service Sector Guide to Greenhouse Gas Management" (May 2006).</p> <p>The emissions estimates are found to be a fair and accurate representation of BLP's actual emissions and are free from material misstatements or omissions. Cventure has verified a total of <u>193,577</u> metric tons of CO<sub>2</sub> equivalent emissions.</p>

2009


**Bloomberg LP**  
**Verification Statement**
**Cventure LLC**  
**June 17, 2010**

## Participant Data

Name:	Bloomberg LP (BLP)
Prepared by:	Kevin Johnson, Cventure LLC <i>Kevin L. Johnson</i>
Emissions Inventory:	<p>Global, corporate-wide FY2009 GHG emissions inventory covering: Scope I direct emissions from fuel combustion, mobile sources (company aircraft), and refrigerant losses; Scope II emissions from total imported electricity and steam; "green" (i.e., renewable) electricity purchases included, and debited from Scope II total electricity consumption; and Scope III emissions associated with employee business travel, supply chain shipping, and paper consumption/waste generation. Boundaries include wholly owned business entities, and owned/leased facilities within which Bloomberg exhibits operational control. CO<sub>2</sub> emissions and HFC refrigerant emissions were estimated. CH<sub>4</sub> and N<sub>2</sub>O emissions from direct combustion, electricity generation, and mobile source combustion emissions were excluded. Bloomberg has no SF<sub>6</sub> or PFC emissions.</p>
Greenhouse Gas Management Plan:	<p>BLP Carbon Emissions Calculation Process (CECP) document (Version 3.0, dated June 3, 2010) developed internally by Bloomberg, to both calculate Bloomberg's carbon emissions, and support the development of an aggressive GHG emissions reduction strategy.</p>
Verification Level of Effort:	<p>Tier II: A Tier II-level verification is appropriate for basic reporting, and those voluntary efforts for which there are no imminent requirements for compliance obligations or emissions trading. It is intended to establish the basis for baseline protection, support claims for credit for early action, and enable assessments of performance of various GHG reduction initiatives by Bloomberg LP toward its future voluntary targets. Given the development status of Bloomberg's GHG emissions inventory and management system, and the system improvements made by Bloomberg in 2009 (and going forward), a Tier II-level verification was appropriate for this project. This verification effort covered Bloomberg's FY2009 GHG emissions inventory.</p>
Summary:	<p>Based on its review of BLP's GHG emissions inventory, Cventure has verified the information submitted by BLP as being consistent with the Bloomberg Carbon Emissions Calculation Process (CECP) emissions methodology and reporting guidance document, Version 3.0, dated June 3, 2010. Cventure finds that the 2009 (January 1, 2009 – December 31, 2009) inventory emissions estimate conforms to generally accepted GHG accounting standards. BLP's CECP document is based upon, and was found to be generally consistent with, the WRI/WBCSD GHG accounting and reporting protocol, and the WRI report, "Hot Climate, Cool Commerce: A Service Sector Guide to Greenhouse Gas Management" (May 2006).</p> <p>The emission estimates are found to be a fair and accurate representation of BLP's actual emissions and are free from material misstatement or omissions. Cventure has verified a total of <u>150,247</u> metric tons of CO<sub>2</sub> equivalent emissions.</p>

## CVENTURE VERIFICATION STATEMENT

2008


**Bloomberg LP**  
**Final Verification Statement**
**Cventure LLC**  
**June 10, 2009**

## Participant Data

Name:	Bloomberg LP (BLP)
Prepared by:	Kevin Johnson and Wiley Barbour, Cventure LLC <i>Kevin L. Johnson</i>
Emissions Inventory:	Global, corporate-wide FY2008 GHG emissions inventory covering: Scope I direct emissions from fuel combustion, mobile sources (company aircraft), and refrigerant losses; Scope II emissions from imported electricity and steam; and Scope III emissions associated with employee business travel, supply chain shipping, and paper consumption/waste generation. Boundaries include owned/leased facilities on an operational control basis. CO <sub>2</sub> emissions and HFC refrigerant emissions were estimated. CH <sub>4</sub> and N <sub>2</sub> O emissions from direct combustion, electricity generation, and mobile source combustion emissions were excluded. Bloomberg has no SF <sub>6</sub> or PFC emissions.
Greenhouse Gas Management Plan:	BLP Carbon Emissions Calculation Process (CECP) document (Version 2.1, dated May 19, 2009) developed internally by Bloomberg, to both calculate Bloomberg's carbon emissions, and support the development of an aggressive GHG emissions reduction strategy.
Verification Level of Effort:	Tier II: A Tier II-level verification is appropriate for basic reporting, and those voluntary efforts for which there are no imminent requirements for compliance obligations or emissions trading. It is intended to establish the basis for baseline protection, support claims for credit for early action, and enable assessments of performance of various GHG reduction initiatives by Bloomberg LP toward its future voluntary targets. Given the development status of Bloomberg's GHG emissions inventory and management system, and the system improvements made by Bloomberg in 2008 (and going forward), a Tier II-level verification was appropriate for this project. This verification effort covered both Bloomberg's FY2008 GHG emissions inventory, as well as the re-statement of their FY2007 GHG emissions inventory (2007R).
Summary:	Based on its review of BLP's second GHG emissions inventory, Cventure has verified the information submitted by BLP as being consistent with the Bloomberg Carbon Emissions Calculation Process (CECP) emissions methodology and reporting guidance document, Version 2.1, dated May 19, 2009. Cventure finds that the 2008 (January 1, 2008 – December 31, 2008) and revised 2007 (January 1, 2007 – December 31, 2007: 2007R) inventory emission estimates conform to generally accepted GHG accounting standards. BLP's CECP document is based upon, and was found to be generally consistent with, the WRI/WBCSD GHG accounting and reporting protocol, and the WRI report, "Hot Climate, Cool Commerce: A Service Sector Guide to Greenhouse Gas Management" (May 2006).  The emission estimates are found to be a fair and accurate representation of BLP's actual emissions and are free from material misstatement or omissions. Cventure has verified a total of <u>159,088</u> metric tons of CO <sub>2</sub> equivalent emissions in 2008, and a re-stated 2007 GHG inventory of <u>155,570</u> metric tons of CO <sub>2</sub> equivalent emissions.



## Statement GRI Application Level Check

GRI hereby states that **Bloomberg LP** has presented its report "The Sustainability Edge - Bloomberg Sustainability Report 2010" to GRI's Report Services which have concluded that the report fulfills the requirement of Application Level B+.

GRI Application Levels communicate the extent to which the content of the G3 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3 Guidelines.

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

14 April 2011, Amsterdam

A handwritten signature in blue ink, appearing to read "Nelmara Arbex".

Nelmara Arbex  
Deputy Chief Executive  
Global Reporting Initiative



The "+" has been added to this Application Level because Bloomberg LP has submitted this report for external assurance. GRI accepts the reporter's own criteria for choosing the relevant assurance provider.

*The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world's most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance. [www.globalreporting.org](http://www.globalreporting.org)*

***Disclaimer:** Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 31 March 2011. GRI explicitly excludes the statement being applied to any later changes to such material.*

**SUSTAINABLE PRODUCTS  
& SERVICES**



Company Name		Please complete the following table in the attached spreadsheet and indicate NR (Not Reported) in sections where data is not available and NA (Not Applicable) where it is not applicable. The data should be absolute values, not economically normalized. If possible please provide data for the last 3 years if available. Please provide data as of the end of the Reporting Fiscal Year (FY), unless otherwise specified.
Period End Date		
Contact Name		
Contact Phones		
Contact Email		
CSR Report Audited: Y/N		
Date Verified		
		The survey is based on the guiding principles of the GRI framework.

Measure	Unit	Scale	% Disclosure	2010	Notes
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**Priority indicators**

Measure	Unit	Scale	% Disclosure	2010	Notes
<b>Environmental Indicators</b>					
Percent of Disclosure	%	actual			Percentage of the company's operations that are covered in its disclosures on sustainability. A blank in this field indicates 100% of operations are covered.
Direct CO2 Emissions	tonnes	'000			Amount of carbon dioxide emitted through operations directly performed by the company, in thousands of metric tonnes.
Indirect CO2 Emissions	tonnes	'000			Amount of carbon dioxide emissions from purchased electricity consumed by the company, in thousands of metric tonnes.
Total CO2 Emissions (Direct CO2 + Indirect CO2)	tonnes	'000			Total amount of carbon dioxide emitted by the company and its suppliers, in thousands of metric tonnes
Travel Emissions	tonnes	'000			Emissions from air and vehicle travel by company employees, in thousands of metric tonnes.
GHG Scope 1 emissions	tonnes	'000			Greenhouse gas (GHG) emissions from the company's direct operations, whether from direct energy production on-site or other industrial activity. In thousands of metric tonnes.
GHG Scope 2 emissions	tonnes	'000			Greenhouse gas (GHG) emissions from energy that is purchased off-site, i.e., electricity, steam, etc.. In thousands of metric tonnes.
Total GHG Emissions (Scope 1 + Scope 2)	tonnes	'000			Total amount of greenhouse gases emitted by the company, in thousands of metric tonnes. Greenhouse gases are carbon dioxide, methane and nitrous oxide emissions that directly contribute to the trapping of heat in the Earth's atmosphere.
GHG Scope 3	tonnes	'000			Greenhouse gas (GHG) emissions from the company's supply chain operations, employee travel and other indirect sources. In thousands of metric tonnes.
Total Energy Consumption	Mwh	'000			Total amount of energy used by the company, both on and off-site, in thousands of megawatt hours (MWh).
Electricity Used	mwh	'000			Total amount of electricity used by the company. In thousands of megawatt hours (MWh).
Water Consumption	m3	'000			Amount of water consumed by the company, in thousands of cubic meters.
Hazardous Waste	tonnes	'000			Amount of hazardous waste the company discards, in thousands of metric tonnes.
Total Waste	tonnes	'000			Total amount of waste the company discards, both hazardous and non-hazardous, in thousands of metric tonnes.
Waste Recycled	tonnes	'000			Total amount of waste the company recycles, in thousands of metric tonnes.
Paper Consumption	tonnes	'000			Paper used by the company for printing, packaging, etc., in thousands of metric tonnes.
Paper Recycled	tonnes	'000			Total amount of paper the company recycles, in thousands of metric tonnes.
ISO 14001 Certified Sites	#	actual			Number of sites the company owns that are certified by the ISO 14001 environmental management standards.
Number of Sites	#	actual			Number of locations the company owned and operated at the end of the reporting period.
% Sites Certified	%	actual			Percentage of the company's total worksites that are certified by the ISO 14001 environmental management standards.
Investments in Sustainability	currency	millions			Amount of money spent by the company on environmental and social projects, in millions. Typical projects include pollution prevention, conservation and recycling as well as health and safety.
<b>Social Indicators</b>					
Number of Employees	#	actual			Total number of company employees at the end of the reporting period as disclosed in the company's social responsibility reports.
Employee Turnover %	%	actual			Number of employees that left the company within the past year expressed as a percentage of the average total number of employees. High employee turnover may indicate that employees are unsatisfied with their work at the company or their compensation, or that conditions at the company are unsafe or unhealthy.
% Employees Unionized	%	actual			Number of employees that belong to labor unions as a percentage of the total number of employees.
Employee Average Age	#	actual			Average age of company employees
% Women in Workforce	%	actual			Number of women employed at the company expressed as a percentage of the total number of company employees.
% Women in Mgt	%	actual			Percentage of women employed in management positions at the company.
% Minorities in Workforce	%	actual			Number of ethnic minorities employed at the company expressed as a percentage of the total number of employees.
% Disabled in Workforce	%	actual			Number of employees with disabilities at the company as a percentage of the total number of company employees.
% Minorities in Mgt	%	actual			Percentage of ethnic minorities employed in management positions at the company.
Workforce Accidents	#	actual			Number of accidents at the company resulting in harm to employees during the reporting period.
Lost Time from Accidents	#	actual			Total number of hours out of work by employees who suffered accidents.
Lost Time Incident Rate	#	actual			Total number of hours that employees were out of work due to accidents, per 200,000 hours worked.
Fatalities - Contractors	#	actual			Number of contractor fatalities at the company.
Fatalities - Employees	#	actual			Number of employee fatalities at the company.
Fatalities - Total	#	actual			Total number of fatalities reported at the company, both employee and contractor.
Community Spending	#	millions			Amount of money spent by the company on community-building activities, in millions.
Employee Training Cost	#	millions			Amount the company spent on employee training during the reporting period.
SRI Assets Under Management	#	millions			Assets managed by the institution according to Socially Responsible Investing (SRI) standards.
<b>Corporate Governance indicators</b>					
Size of the Board	#	actual			Number of directors on the company's board.
Independent Directors	#	actual			Total number of board members that can be classified as independent. Independent board members are not employees of the company, have not received a large sum of direct compensation from the company and are not directly related to any of the company's executives.
% Independent Directors	%	actual			Independent directors as a percentage of total board membership.
% Women on Board	%	actual			Percentage of women on the board of directors.
Board Average Age	#	actual			Average age of the members of the board.
Board Age Limit	#	actual			Age limit for serving on the Board of Directors.
Board Duration (Years)	#	actual			Length of a board member's term, in years. For boards which allow renewal of terms, it is the length of a single term prior to renewals.
# Board Meetings	#	actual			Total number of corporate board meetings held in the past year.
Audit Committee Meetings	#	actual			Number of meetings of the Board's Audit Committee during the reporting period.
Board Mtg Attendance	#	actual			Percentage of members in attendance at board meetings during the period.
Political Donations	#	millions			Amount of corporate donations to political groups, parties, or individuals, in millions.
CEO Duality	---	Y or N			Indicates whether the company's Chief Executive Officer is also Chairman of the Board. 'N' indicates the two roles are separate.



Company Name		Please complete the following table in the attached spreadsheet and indicate NR (Not Reported) in sections where data is not available and NA (Not Applicable) where it is not applicable. The data should be absolute values, not economically normalized. If possible please provide data for the last 3 years if available. Please provide data as of the end of the Reporting Fiscal Year (FY), unless otherwise specified.
Period End Date		
Contact Name		
Contact Phones		
Contact Email		
CSR Report Audited: Y/N		
Date Verified		The survey is based on the guiding principles of the GRI framework.

Measure	Unit	Scale	% Disclosure	2010	Notes
<b>Secondary indicators</b>					
E	NOx Emissions	tonnes	'000		Total amount of nitrogen oxide (NOx) emitted by the company, in thousands of metric tonnes.
E	SO2 Emissions	tonnes	'000		Total amount of sulfur dioxide (SO2) emitted by the company, in thousands of metric tonnes.
E	SOx Emissions	tonnes	'000		Total amount of sulphur oxides (SOx) emitted by the company, in thousands of metric tonnes. Includes sulphur dioxide.
E	VOC Emissions	tonnes	'000		Total amount of volatile organic compounds (VOCs) emitted by the company, in thousands of metric tonnes.
E	CO Emissions	tonnes	'000		Total amount of carbon monoxide (CO) emitted by the company, in thousands of metric tonnes.
E	Methane Emissions	tonnes	'000		Total amount of methane emitted by the company, in thousands of metric tonnes.
E	ODS Emissions	tonnes	'000		Total amount of ozone-depleting substances (ODS) emitted by the company, in thousands of metric tonnes.
E	Particulate Emissions	tonnes	'000		Total amount of particulates emitted by the company, in thousands of metric tonnes.
E	Renewable Energy Use	Mwh	'000		Amount of energy consumed that was generated by a renewable energy source, in thousands of megawatt hours (MWh)
E	% Water Recycled	%	actual		Percentage of water usage from recycled sources.
E	Discharges to Water	m3	'000		Amount of discharges to water that influence the biophysical or chemical quality of the water, in thousands of cubic meters.
E	Waste Water	m3	'000		Liquid waste discharged by the corporation. In thousands of cubic meters.
E	Fuel Used	liter	'000		Total amount of fuel consumed by the company, in thousands of liters. Includes conventional fossil fuels like oil, gas, coke, coal, diesel fuel.
E	Raw Materials Used	tonnes	'000		Total amount of raw materials consumed by the company, in thousands of metric tonnes.
E	% Recycled Materials	%	actual		Percentage of raw materials used from recycled sources
E	Gas Flaring	tonnes	'000		Total amount of gas flared and vented by the company, in thousands of metric tonnes.
E	Number of Spills	#	actual		Actual number of spills of hazardous materials by the company in the period.
E	Amount of Spills	tonnes	'000		Amount of spills of hazardous materials by the company in the reporting period, in thousands of metric tonnes.
E	Nuclear % Total Energy	%	actual		Percentage of total energy production that came from nuclear power.
E	Solar % Total Energy	%	actual		Percentage of total energy production that came from solar power.
E	Phones Recycled	#	actual		Number of cellular phones that were recycled by the company in the period, in millions.
E	Environmental Fines #	#	actual		Number of environmental fines paid by the company in the period.
E	Environmental Fines \$	#	millions		Total amount of environmental fines paid by the company in the period, in millions.
E	Environmental Accounting Cost	#	'000		Accounting costs related to environmental concerns during the reporting period. Includes remediation costs, which is the cost of environmental cleanup associated with spills and pollution.
E	Energy Efficiency Policy	---	Y or N		Indicates whether the company has a policy on the efficient use of energy. 'N' indicates the company has not explicitly disclosed this policy in its most recent Annual or Company Responsibility Reports.
E	Emissions Reduction Initiatives	---	Y or N		Indicates whether the company has a policy on efforts to reduce emissions output.
E	Environmental Supply Chain Management	---	Y or N		Indicates whether the company has a policy to address environmental supply chain management.
E	Green Building Policy	---	Y or N		Indicates whether the company has a policy regarding its efforts to use environmentally friendly procedures in the design and construction of its buildings. 'N' indicates the company has not explicitly disclosed this policy in its most recent Annual or Company Responsibility Reports.
E	Waste Reduction Policy	---	Y or N		Indicates whether the company has a policy on reducing the waste emitted by its operations. 'N' indicates the company has not explicitly disclosed this policy in its most recent Annual or Company Responsibility Reports.
E	Sustainable Packaging	---	Y or N		Indicates whether the company has a policy regarding its efforts to use environmentally friendly packaging for its products.
E	Environmental Quality Management Policy	---	Y or N		Indicates whether the company has a policy to achieve a high level of environmental quality in its operations. 'N' indicates the company has not explicitly disclosed this policy in its most recent Annual or Company Responsibility Reports.
E	Climate Change Policy	---	Y or N		Indicates whether the company has announced how it is responding to climate change. 'N' indicates the company has not explicitly disclosed this policy in its most recent Annual or Company Responsibility Reports.
E	New Products - Climate Change	---	Y or N		Indicates whether the company has developed products in response to climate change.
E	Biodiversity Policy	---	Y or N		Indicates whether the company has a policy for protecting biodiversity, such as trees and vegetation as well as wildlife and endangered species.
E	Verification Type	---	Y or N		Indicates whether the company's environmental policies were subject to an independent assessment for the reporting period.
S	Health and Safety Policy	---	Y or N		Indicates whether the company has recognised its health and safety risks and responsibilities and is making any effort to improve the management of employee health and/or employee safety. "N" indicates that the company has not explicitly disclosed any such efforts in its most recent Annual or Company Responsibility reports.
S	Fair Remuneration Policy	---	Y or N		Indicates if the company has demonstrated a group wide commitment to ensure payment of a fair (could be defined as minimum, living, or some other criteria) wage to all Group employees, even in those countries that do not legally require a minimum wage.
S	Training Policy	---	Y or N		Indicates whether the company has established policies to train new and existing employees on health and safety. 'N' indicates the company has not explicitly disclosed this policy in its most recent Annual or Company Responsibility Reports.
S	Employee CSR Training	---	Y or N		Discloses whether the company conducts training courses for employees on Corporate Social Responsibility (CSR).
S	Equal Opportunity Policy	---	Y or N		Indicates whether the company has made a proactive commitment to ensure non-discrimination against any type of demographic group. This could be in the form of an equal opportunities policy, as described by the company.
S	Human Rights Policy	---	Y or N		Indicates whether the company has implemented any initiatives to ensure the protection of the rights of all people it works with. "N" indicates that the company has not explicitly disclosed any such efforts in its most recent Annual or Company Responsibility reports.
S	UN Global Compact Signatory	---	Y or N		Indicates whether the company is a signatory of the United Nations Global Compact.

Should you have any questions, please do not hesitate to contact us:  
[bsustainable@bloomberg.net](mailto:bsustainable@bloomberg.net)

## Docket ID No. EPA-HQ- OAR-2009-0924

Proposed Confidentiality Determinations for Data Required Under the Mandatory Greenhouse Gas Reporting Rule  
75 Fed. Reg. 39094 (July 7, 2010)

### **Comments of Bloomberg LP**

Bloomberg is the world's most trusted source of information for businesses and professionals. ([http: www.bloomberg.com](http://www.bloomberg.com)) Our sole interest is in making sure that timely, accurate, transparent and useable information regarding Greenhouse Gas (GHG) emissions is made available to our customers in the business and financial community. Thus, we share common interests with EPA.

As a matter of practical necessity, we acknowledge that decisions about confidential business information (CBI) must be made on a categorical basis. However, Bloomberg advocates minimizing the adverse effects of withholding GHG information from the investing public through three specific suggestions that we offer for EPA's consideration:

**1. To achieve its regulatory goals of facilitating comparisons by investors and encouraging the development of a low GHG economy, EPA should routinely make production volume data available whether or not the data was used in GHG computations.**

GHG emissions are not meaningful in isolation; GHG intensity per unit of output is what counts to investors and the business community.

**2. To facilitate investment decisions, EPA should report data in a format that identifies and aggregates GHG emissions data at the parent and holding company levels, as well as by individual facilities.** Investors do not invest in "facilities," but in publicly-traded parent companies. They need information about what companies own the facilities, as well as facility-specific emissions data.

**3. To insure that GHG emissions data is trustworthy and transparent, EPA should require the full disclosure of the input data and assumptions so that the public can verify the accuracy of GHG estimates for itself, except where a third party verifiers has certified the data.**

Requiring reporter to either disclose input data or use a third-party verifier, would create an incentive or "nudge" toward greater use of third party verifiers, which Bloomberg favors, while still accommodating the

legitimate needs of companies that believe that releasing input data to the public would cause them competitive harm by allowing them to make the disclosure instead *in camera* to a third party verifier who could be required by contract to keep it confidential.

In what follows, Bloomberg introduces itself in more detail and explains the rationale behind each of its three suggestions.

## **I. Introduction of Bloomberg and its Interest in GHG Disclosure.**

Bloomberg is the world's most trusted source of information for businesses and professionals. Bloomberg combines innovative technology with unmatched analytic, data, news, display and distribution capabilities, to deliver critical information via the BLOOMBERG PROFESSIONAL® service and multimedia platforms. Bloomberg's media services cover the world with more than 2,300 news and multimedia professionals at 146 bureaus in 72 countries. The BLOOMBERG TELEVISION® 24-hour network delivers smart television to more than 240 million homes. BLOOMBERG RADIO® services broadcast via SIRIUS XM Radio and 1worldspace™ satellite radio globally and on WBBR 1130AM in New York. The award-winning monthly BLOOMBERG MARKETS® magazine, Bloomberg BusinessWeek magazine and the BLOOMBERG.COM® financial news and information Web site provide news and insight to businesses and investors. For more information, please visit <http://www.bloomberg.com>.

Bloomberg strongly supports making GHG information available to business and the investing public whom it serves. "Most executives know that how they respond to the challenge of sustainability will profoundly affect the competitiveness—and perhaps even the survival—of their organizations," as David Lubin and Daniel Esty point out in a recent article in the *Harvard Business Review*.<sup>1</sup> Therefore, the business and financial community and the investing public, which Bloomberg serves, is very interested in comparing GHG information from different business as one salient index of their awareness of, and success in managing, sustainability concerns.

Astute long-term investors understand that markets include more than financial statements when valuing an investment. By quantifying and evaluating these intangibles, investors have a better understanding of the risks and opportunities associated with potential investments.

Company environmental performance is an important intangible and is increasingly considered by investors as a material risk/opportunity (operational,

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<sup>1</sup> David A. Lubin and Daniel C. Esty, The Sustainability Imperative, *Harvard Business Review* (2010) 88(5), 42-50.

<http://hbr.org/2010/05/the-sustainability-imperative/ar/1>

financial, regulatory, market, reputational, geographic). While identifying and quantifying the often complex ways that environmental issues can impact a company remains challenging, some clarity has emerged around measuring company carbon emissions and using the data to enhance valuation.

Progress has been made towards standardizing methodology, accelerating adoption and increasing/improving company disclosure around emissions; however, material data gaps and transparency issues remain - inconsistent disclosure across industries and regions limits comprehensive analysis and weakens investor's ability to adequately value investments.

Bloomberg's current efforts rely on disparate sources – some voluntary company disclosure, some regulatory, some third party – that requires significant resources to try and standardize and normalize, often with mixed results.

## **II. EPA should routinely make production volume data available whether or not production data was used in GHG computations.**

EPA has proposed to determine that all “Production/Throughput Data That Are Not Inputs to Emission Equations” is confidential business information that will result in competitive harm if disclosed to the public. Item 10, 75 Fed.Reg. at 39115.

Bloomberg disagrees and respectfully requests EPA to re-consider and make production/throughput information routinely available to the public, rather than routinely withhold it. The reason is that GHG emissions information is not meaningful in isolation, but must be compared with a company or facility's *output* in order to be meaningful. For example, GE recently reported that its “GHG intensity” had dropped by 39%.<sup>2</sup> But such meaningful comparisons among companies cannot be made without production information.

Moreover, Bloomberg respectfully suggests that production information is routinely made available in many industries, or reported to the government and disclosed without harm. Therefore, EPA categorical presumption is not justified that *all* production or throughput information in every industry or context is highly sensitive and would result in competitive harm, as is required to withhold information under Exemption 4 of the Freedom of Information Act (FOIA). FOIA was enacted for the purpose of making information in the possession of the government more freely available to the public. Its exemptions are narrowly construed and applied. Despite the administrative burdens, EPA is simply not justified in erecting an irrebuttable presumption that all production or throughput information would cause competitive harm if released.

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<sup>2</sup> GE Citizenship Report: GHG Intensity Falls 39% (July 21, 2010) <http://www.environmentalleader.com/2010/07/21/ge-citizenship-report-ghg-intensity-falls-39/>

Moreover, EPA's position is internally contradictory, because the risks of competitive harm are equivalent whether or not production information is or is not used in GHG computations.

In lieu of its unjustified presumption that all production and throughput information would result in competitive harm, EPA should allow a showing on an industry-by-industry basis whether production and throughput data is actually sensitive in that particular industry, and maintain and update a list from time to time of whether such an industry-wide categorical showing has or has not been made.

But EPA is not justified, on either a policy or legal basis, from withholding production information for *every* industry just because it can be imagined that such data might be sensitive in some situations. Rather, EPA has an obligation to build a factual record to support its speculation.

### **III. EPA should report data in a format that identifies and aggregates GHG emissions data at the parent and holding company levels, as well as by individual facilities.**

EPA has requested comment on "suggestions on formats for presenting both CBI and non-CBI data that would be most useful to the public." 75 Fed.Reg. at 39100, col. 1.

Based on Bloomberg's experience in making GHG data available to the business and financial community since 2005, the single most important thing that EPA could do to facilitate access to GHG data by the public – and to maximize the incentives to develop a lower GHG economy -- would be to aggregate the data from facilities, up through divisions to parent companies and holding companies, which is the level of organization at which financial and investment decisions are made.

It is understandable that EPA requires reporting on a facility-by-facility basis, for enforcement and regulatory purposes. Bloomberg supports reporting and making available facility-specific data, which is useful for some purposes, such as informing the neighborhood and for more detailed, local level operational, reputational and regulatory risk assessment by investors. But GHG are also a worldwide issue, and GHG data should also be aggregated to the company or even holding company level, so that investors may make comparative decisions, and competitive pressures can be brought to bear on companies to reduce GHG emissions.

Under the present system, Bloomberg is forced to spend a great deal of time and money trying to relate facility-specific data to the companies that own and

operate these facilities. The necessary data to make the translation is not always easily available.

EPA should make GHG data available not only in a facility-by-facility format, but also aggregated into investable units, such as parent companies.

**IV. EPA should require disclosure of the input data so that the public can verify the accuracy of GHG estimates, except where a third party verifiers has certified the data.**

EPA has proposed to determine that “Inputs to Emission Equations” are “emissions data” that cannot qualify as CBI (Item 4, 75 Fed.Reg at p. 39108, col. 2 and following) and has also “solicits comments on whether and to what extent the use of CEMS [Continuous Emission Monitors] would relieve industry concerns regarding making [input] data available to the public.” 75 Fed.Reg. at p. 39109, col 3.

As a logical outgrowth of EPA’s CEM suggestion, and of industry concerns about disclosure of input data, Bloomberg suggests that EPA require the disclosure of input data, except whether it has either been verified by a CEM, or has been disclosed to a third-party verifier *in camera*.

Bloomberg strongly supports third-party verification. While making input data available to the public is better than keeping it secret, as a practical matter, a professional third-party verifier will do a better job at the highly-technical job of GHG verification than just making the inputs available to the public. EPA should “nudge”<sup>3</sup> industry in the direction of greater use of third-party verifiers by providing that input data that has been disclosed to a qualified third-party verifier *in camera* does not need to be disclosed publicly, where it may cause competitive harm.

Courts commonly handle sensitive but important information by inspecting it *in camera*. Third-party verifiers could perform the same function with regard to GHG data. If a third-party verifier inspects input data and verifies that GHG emissions are correct, they should co-report the data to EPA so that they become equally liable for any fraudulent reporting.

On the other hand, industry cannot complain about public disclosure of input data if EPA offers the alternative of third-party verification.

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<sup>3</sup> RICHARD H. THALER AND CASS R. SUNSTEIN, NUDGE: IMPROVING DECISIONS ABOUT HEALTH, WEALTH, AND HAPPINESS (Yale Press, 2008).

Bloomberg appreciates this opportunity to shares its views on this important topic with EPA.

Respectfully submitted,

Bloomberg LP  
Curtis Ravenel, Director of Sustainability

Willkie Farr & Gallagher LLP  
Attorneys for Bloomberg LP

A handwritten signature in black ink that reads "E. Donald Elliott". The signature is written in a cursive, flowing style with a prominent initial "E" and a distinct dot over the "i" in "Elliott".

E. Donald Elliott, Partner

## 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.



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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.

# Bloomberg

## LIST OF AWARDS (JOURNALISM)

### ENVIRONMENTAL & SOCIAL JOURNALISM REPORTING AWARDS

Organization	Winning Category	Article	Date	Author
<b>NAAJ: North American Agricultural Journalist</b>	Feature Writing	"Dead Children Linked to Aid Policy in Africa Favoring Americans"	12/8/08	Alan Bjerga
	Special Projects: "Recipe for Famine" 7-part series	<ol style="list-style-type: none"> <li>1. "Dead Children Linked to Aid Policy in Africa Favoring Americans"</li> <li>2. "How Famine Lurked Behind Vienna Toast Where Joe Cocker Crooned"</li> <li>3. "World Bank's 'Wrong Advice' Left Silos Empty in Poor Countries"</li> <li>4. "Government Bribes in Cameroon Divert Funds From Food Amid Riots"</li> <li>5. "Wasting Enough Rice to Feed 184 Million Is Habit Only Rats Love"</li> <li>6. "Corn Futures Spark Riots as Speculators Take Trading to Limit"</li> <li>7. "Eating Isn't an Option When Minnesota Corn Burns in Houston Cars"</li> </ol>	<ol style="list-style-type: none"> <li>1. 12/8/08</li> <li>2. 12/9/08</li> <li>3. 12/10/08</li> <li>4. 12/11/08</li> <li>5. 12/12/08</li> <li>6. 12/15/08</li> <li>7. 12/16/08</li> </ol>	<ol style="list-style-type: none"> <li>1. Alan Bjerga</li> <li>2. Alan Katz and Carlos Caminada</li> <li>3. Alison Fitzgerald and Helen Murphy</li> <li>4. Alison Fitzgerald and Christopher Swann</li> <li>5. Jason Gale and Luzi Ann Javier</li> <li>6. Ian Katz and Ari Levy</li> <li>7. Peter Robison</li> </ol>
<b>OVERSEAS PRESS CLUB OF AMERICA:</b>	Malcolm Forbes Award: "Recipe for Famine" Staff of Bloomberg News	See Above	See Above	See Above
<b>NEW YORK PRESS CLUB</b>	Continuing Coverage: PRINT: "Recipe for Famine"	See Above	See Above	See Above
	<b>Citation:</b> Madeline Dane Ross Award (Reporting on the Human Condition)	"China in Africa: Young Workers, Deadly Mines" <i>Bloomberg Markets</i>	Sept. 2008	Simon Clark, Michael Smith and Franz Wild
<b>SABEW</b>	<b>Enterprise</b>	"China Lets Child Workers Die Digging in Congo Mines for Copper"	7/22/08	Simon Clark, Michael Smith and Franz Wild
		"China Defies Peru Rescue of Miners Afflicted With Lung Disease"	7/22/08	Michael Smith
	<b>Projects</b>	"Recipe for Famine"		Alan Bjerga, Carlos Caminada, Alison Fitzgerald, Jason Gale, Luzi Ann Javier, Alan Katz, Ian Katz, Pius Lukong, Helen Murphy, Christopher Swann and Peter Robison.

Organization	Winning Category	Article	Date	Author
<b>BUSINESS JOURNALIST OF THE YEAR AWARDS (BJOYA)</b>	Best Magazine Story	"China in Africa: Young Workers, Deadly Mines" Bloomberg Markets	Sept. 2008	Simon Clark, Michael Smith and Franz Wild
	International Reporting Category	"Racism, the Word Not Spoken" Bloomberg Markets	August 2008	Telma Marotto
<b>BRAZIL AWARD</b>	Paul Donovan Kigar Prize	"Plundering the Amazon" Bloomberg Markets	September 2009	Michael Smith and Adriana Brasileiro
<b>SABEW (1) WINNER</b>		"Plundering the Amazon" <i>Bloomberg Markets</i>	Sept. 2009	Michael Smith and Adriana Brasileiro
<b>Overseas Press Club Awards (1) WINNER</b>	Class Eighteen: The Whitman Bassow Award	"Sanitation Nightmare" <i>Bloomberg Markets</i>	April 2009	Jason Gale
<b>FOLIO - EDDIE AWARDS: (1) WINNER</b>	<b>Division: Consumer&gt;&gt;Business Financial Feature/Single Story</b>	"Plundering the Amazon" <i>Bloomberg Markets</i>	Sept. 2009	Michael Smith and Adriana Brasileiro
<b>NATIONAL HEADLINER AWARDS</b>	<b>(1) Second Place</b>	"AARP's Stealth Fees" <i>Bloomberg Markets</i>	January 2009	Gary Cohn and Darrell Preston
<b>IRE Awards (1) Finalist</b>	Category: Other Media: Magazine/Specialty Publication	"Plundering the Amazon" <i>Bloomberg Markets</i>	Sept. 2009	Michael Smith and Adriana Brasileiro
<b>SAJA Journalism Awards: (1) Finalist</b>	Category 1: Daniel Pearl Award	"Sanitation Nightmare" <i>Bloomberg Markets</i>	April 2009	Jason Gale
		"India Failing to Control Open Defecation Blunts Nation's Growth"	3/4/09	
<b>FOREIGN PRESS ASSOCIATION AWARDS (UK) (1) Finalist</b>	<b>Story of the Year/Print &amp; Web:</b>	"Duping the Families of Fallen Soldiers" <i>Bloomberg Markets</i>	Sept. 2010	David Evans
<b>GREEN EYESHADE AWARDS</b>	Category 11: Enterprise Business Reporting - FINALIST	"Boomer Bows Out in Shakeout That Led to Vermont Beard"	4/27/09	Mark Clothier and John Helyar
<b>NEWSWOMEN'S CLUB OF NEW YORK</b>	Front Page Awards	"End of Life Warning at \$618,616 Makes Me Wonder Was It Worth It" – Bloomberg Businessweek	3/15/10	Amanda Bennett

**ENVIROMENTAL OPERATIONS**

## LIST OF AWARDS (ENVIRONMENTAL)

### EPA GREEN POWER PARTNERSHIP

We won an award from the EPA Green Power Partnership at their Green Power Leadership Awards Ceremony for Green Power Purchasing. We are the 28th largest procurer of renewable energy credits in the United States -

<http://www.epa.gov/greenpower/toplists/top50.htm>.

### 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

Our San Francisco office was awarded LEED Gold Certification for Commercial Interiors (11/4/2008). This 24,800 square foot office accommodates 180 Bloomberg employees.

Our Tokyo office was the first in Japan to be awarded LEED Gold Certification for Commercial Interiors (8/19/2009). This project is Bloomberg LP's first LEED project in Asia. This 11,000 square foot office accommodates 96 Bloomberg employees.

Our office at 38 Finsbury in London received LEED Platinum certification for Commercial Interiors (11/9/2009). This office is Bloomberg's first to achieve Platinum certification and our first LEED project in Europe. This 19,600 square foot office accommodates 302 Bloomberg employees - <http://www.usgbc.org/LEED/Project/CertifiedProjectList.aspx> .

**Bloomberg**

***BLP CARBON EMISSIONS CALCULATION PROCESS***

*Version 4.0*

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## Revision History

Date	Version	Description	Authors
7/14/08	1.0	Document to detail process by which we calculate Bloomberg LP's Carbon Emissions for 3 <sup>rd</sup> Party Validation.	Curtis Ravenel, Jason Shulman
9/15/08	1.1	Document to detail process by which we calculate Bloomberg LP's Carbon Emissions for 3 <sup>rd</sup> Party Validation.	Curtis Ravenel, Jason Shulman
12/11/08	2.0	Document to detail process by which we calculate Bloomberg LP's Carbon Emissions for 3 <sup>rd</sup> Party Validation.	Jason Shulman
5/19/09	2.1	Document to detail process by which we calculate Bloomberg LP's Carbon Emissions for 3 <sup>rd</sup> Party Validation.	Jason Shulman
4/28/10	3.0	Document to detail process by which we calculate Bloomberg LP's Carbon Emissions for 3 <sup>rd</sup> Party Validation.	Jason Shulman
4/7/11	4.0	Document to detail process by which we calculate Bloomberg LP's Carbon Emissions for 3 <sup>rd</sup> Party Validation.	Jason Shulman

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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

Name	Department
Peter Grauer	Chairman
Dan Doctoroff	President
Kate Schroeder (Sustainability Steering Team)	Chairman's Office
Curtis Ravenel	Sustainability Team – Manager
Lee Ballin	Sustainability Team – Supply Chain/Waste Reduction
Michael Barry	Sustainability Team – Facilities & Technology
Jason Shulman	Sustainability Team – Reporting & Analysis
Marc Swartz (Sustainability Steering Team)	Sales
Melinda Wolfe (Sustainability Steering Team)	Human Resources
Kevin Sheekey (Sustainability Steering Team)	Public Relations
Jack Davis (Sustainability Steering Team)	Supply Chain
Ken Cooper (Sustainability Steering Team)	Operations
Andy Ely (Sustainability Steering Team)	R&D Systems & Data Solutions
Erana Stennett (Sustainability Steering Team)	Philanthropy
Margaret Trapp (Sustainability Steering Team)	News
Maureen McGuire (Sustainability Steering Team)	Marketing

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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](http://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):** As per the WRI report referenced above, because BLP owns all its business units 100%, its organizational boundary is pre-defined and does not require a subsequent Equity/Financial/Operational Control determination.

Regarding the Operational boundaries of BLP's Carbon Emissions (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 CO<sub>2</sub>e emissions (including CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O) 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](http://www.theclimategroup.org)). BLP calculates CO<sub>2</sub>e for Paper and Waste, and strictly CO<sub>2</sub> for Supply Chain and Travel. Emissions calculations for the latter will be expanded to include CH<sub>4</sub> and N<sub>2</sub>O for 2011 year-end calculations.
- 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 CO<sub>2</sub>e 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 CO<sub>2</sub>e emissions, including identifying specific CO<sub>2</sub>e 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.

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- **Acquisition:** If BLP were to acquire additional operations (does not pertain to organic growth), it would assess the CO<sub>2</sub>e emissions impact of that acquired operation for the current year, and subsequently make a full-year assessment and adjust 2007 baseline and subsequent years' results so future comparisons would be applicable.

**NOTE:** 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 plans to determine a full-year emissions impact of those acquired operations at the time of acquisition and apply them to prior years' emissions totals for the purpose of effective comparison. This will be done as part of a re-validation of BLP emissions for years 2007-2009.

- **Divestiture:** If BLP were to divest operations, it would assess the CO<sub>2</sub>e emissions impact of that divested operation for the current year, and subsequently make a full-year assessment and adjust 2007 baseline and subsequent years' results so future comparisons would be applicable.
  - **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 CO<sub>2</sub>e 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.
  - **CO<sub>2</sub> Factor Revision:** If factors become available that are applicable to prior years (i.e. factors become available in 2008 that were applicable to 2006), 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 CO<sub>2</sub>e 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 year(s)' CO<sub>2</sub>e 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.

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## 2.1 Use of Conversion Factors to Measure Emissions

BLP uses CO<sub>2</sub>/CH<sub>4</sub>/N<sub>2</sub>O conversion factors from multiple sources (sources and, when applicable, version/date of all CO<sub>2</sub> 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 CO<sub>2</sub>e 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

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- Building Common-Area Electricity (Primarily Heating, Ventilation, Air Conditioning (HVAC))
- Hydroflourocarbons (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.
- **Paper Consumption:** Includes Office Paper (paper supplies used by Bloomberg Offices and BLP INK), BLP Press (outsourced at the end of 2009) and paper consumption associated with creating Markets and Businessweek magazines.
- **Landfill Waste:** Global BLP waste that is neither recycled nor composted.

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 through 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.

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## **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).
- **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.

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#### **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. APPENDICIES

#### 3.1 Appendix 1 - 2010 BLP Carbon Emissions

##### 2010 CARBON EMISSIONS TALLY

	<u>CO2e (MT)</u>	<u>Scope</u>
<b>FACILITIES</b>		
Electric, incl. Common Area (Includes BW/NEF 2010 data):	97,591.32	II
<b>Non-Electric:</b>		
Gas	1,794.97	I
Steam	720.00	II
Oil	1,021.26	I
HFC (Actual)	<u>440.55</u>	I
<b>Total Non-Electric:</b>	<b>3,976.78</b>	
<b>TOTAL FACILITIES:</b>		<b>101,568.10</b>
<b>TRAVEL</b>		
Air Travel	28,530.23	III
Private Aircraft Travel	2,703.86	I
Rail Travel	237.61	III
Car Service	605.79	III
Rental Car	554.51	III
Taxi	634.84	III
Field Service Technician Vehicles	428.48	III
<b>TOTAL TRAVEL:</b>		<b>33,695.31</b>
<b>SUPPLY CHAIN</b>		
Asset Management	1,850.91	III
BLP INK	178.24	III
Markets Magazine Distribution	3,696.18	III
Businessweek Distribution	18,383.86	III
<b>SUPPLY CHAIN:</b>		<b>24,109.19</b>
<b>PAPER/WASTE</b>		
Office Paper Consumption	696.34	III
Markets Magazine	4,777.54	III
Businessweek Magazine	26,663.98	III
Waste	2,066.74	III
<b>TOTAL PAPER/WASTE:</b>		<b>34,204.60</b>
<b>TOTAL 2010 BLP CARBON EMISSIONS:</b>		<b>193,577.20</b>
<b>BY SCOPE:</b>		
SCOPE I	5,960.64	
SCOPE II	98,311.32	
SCOPE III	<u>89,305.24</u>	
<b>TOTALS:</b>	<b>193,577.20</b>	



## 3.2 Appendix 2 – Facilities

### 3.2.1 Data Detail

FACILITIES DETAIL					
Data	Scope	Usage Measure	Data Source	Data Completeness	Business Owner
Full Facility List	N/A	N/A	Tririga Database	Direct Complete	K. Saavedra
Purchased Electricity	2	Kwh	<ol style="list-style-type: none"> <li>1) Vendor Invoices from NUS</li> <li>2) Vendor Invoices from SAP</li> <li>3) Direct meter information from landlord</li> <li>4) Pro-rated building meter information from landlord</li> <li>5) Estimation based on similar facilities</li> </ol>	Varies by facility	J. Shulman/ M. Barry
Oil Consumption	1	Gallons	<ol style="list-style-type: none"> <li>1) Vendor Invoices from NUS</li> <li>2) Vendor Invoices from SAP</li> <li>3) Usage Log from applicable Facility Mgr.</li> </ol>	Direct Complete	J. Shulman/ M. Barry
Natural Gas Consumption	1	Therms	<ol style="list-style-type: none"> <li>1) Vendor Invoices from NUS</li> <li>2) Vendor Invoices from SAP</li> <li>3) Direct meter information from landlord</li> </ol>	Direct Complete	J. Shulman/ M. Barry
Steam (to Kwh) Consumption	2	mlbs (thousand lbs)	<ol style="list-style-type: none"> <li>1) Vendor Invoices from NUS</li> <li>2) Vendor Invoices from SAP</li> <li>3) Direct meter information from landlord</li> </ol>	Direct Complete	J. Shulman/ M. Barry
HVAC	2	Kwh	<ol style="list-style-type: none"> <li>1) Owned Facilities: Incl. in our metered Electricity Kwh.</li> <li>2) Rental Space: Landlord provides metered or pro-rated bldg Kwh.</li> <li>3) BLP Analyst estimates</li> </ol>	Direct Complete for 731 Lexington. Landlord-provided for select others, Estimated for the rest.	J. Shulman/ M. Barry
HFC	1	Lbs	Facility Maintenance Reports	Direct Complete for owned facilities.	J. Shulman/ M. Barry

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### 3.2.2 CO2 Factors

US FACILITIES - PURCHASED KWH						
eGrid Region	eGrid Subregion Name	Subregion Acronym	CO2 Grams/KWh	CH4 Grams/KWh	N2O Grams/KWh	Section
ASCC	Alaska Grid	AKGD	582.75	0.0123	0.0034	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
ASCC	Miscellaneous	AKMS	243.01	0.0103	0.0020	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
WECC	Southwest	AZNM	568.18	0.0085	0.0075	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
WECC	California	CAMX	308.90	0.0128	0.0028	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
ERCOT	All	ERCT	568.16	0.0081	0.0063	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
FRCC	All	FRCC	553.44	0.0187	0.0069	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
HICC	Miscellaneous	HIMS	609.55	0.0613	0.0098	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
HICC	Oahu	HIOA	735.17	0.0413	0.0095	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
MRO	East	MROE	767.63	0.0131	0.0132	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
MRO	West	MROW	803.56	0.0134	0.0136	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
NPCC	New England	NEWE	375.56	0.0349	0.0069	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
WECC	Northwest	NWPP	389.54	0.0074	0.0062	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
NPCC	NYC/ Westchester*	NYCW	319.70	0.0119	0.0015	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
NPCC	Long Island	NYLI	643.54	0.0411	0.0059	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
NPCC	Upstate NY	NYUP	308.67	0.0079	0.0045	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
RFC	East	RFCE	480.50	0.0124	0.0077	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
RFC	Michigan	RFCM	748.94	0.0148	0.0126	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
RFC	West	RFCW	703.76	0.0083	0.0118	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
WECC	Rockies	RMPA	992.20	0.0121	0.0152	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
SPP	North	SPNO	815.89	0.0096	0.0132	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
SPP	South	SPSO	736.66	0.0111	0.0102	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
SERC	Mississippi Valley	SRMV	455.46	0.0099	0.0051	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
SERC	Midwest	SRMW	807.07	0.0093	0.0134	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
SERC	South	SRSO	678.34	0.0107	0.0111	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
SERC	Tennessee Valley	SRTV	698.92	0.0090	0.0116	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
SERC	Virginia/ Carolina	SRVC	507.31	0.0101	0.0087	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
Overall US			<b>589.46</b>	<b>0.0114</b>	<b>0.0090</b>	EPA eGrid2010 Version 1.0 - REVISED Year 2007 Summary Tables (Created February 2011)
NEW YORK CITY SPECIFIC			299.46	0.0053	0.0015	PLANYC Inventory of New York City Greenhouse Gas Emissions September 2010

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GLOBAL FACILITES - PURCHASED KWH				
Country	CO2 Grams/KWh	CH4 Grams/KWh	N2O Grams/KWh	CO2 Grams/KWh
Argentina	366	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Australia	883	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Austria	183	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Bahrain	651	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Belgium	249	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Brazil	89	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Bulgaria	489	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Canada	181	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Cayman Islands	785	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Channel Islands	83	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Chile	412	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
China	745	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Colombia	107	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Croatia	341	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Cyprus	759	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Czech Republic	544	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Denmark	308	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Ecuador	262	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Egypt	460	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Estonia	752	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Finland	187	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
France	83	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Germany	441	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Ghana	214	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Greece	731	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Hong Kong	757	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Hungary	331	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Iceland	1	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
India	968	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Indonesia	726	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Ireland	486	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Israel	693	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Italy	398	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Jamaica	785	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Japan	436	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Jordan	589	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Kazakhstan	439	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Kenya	329	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)

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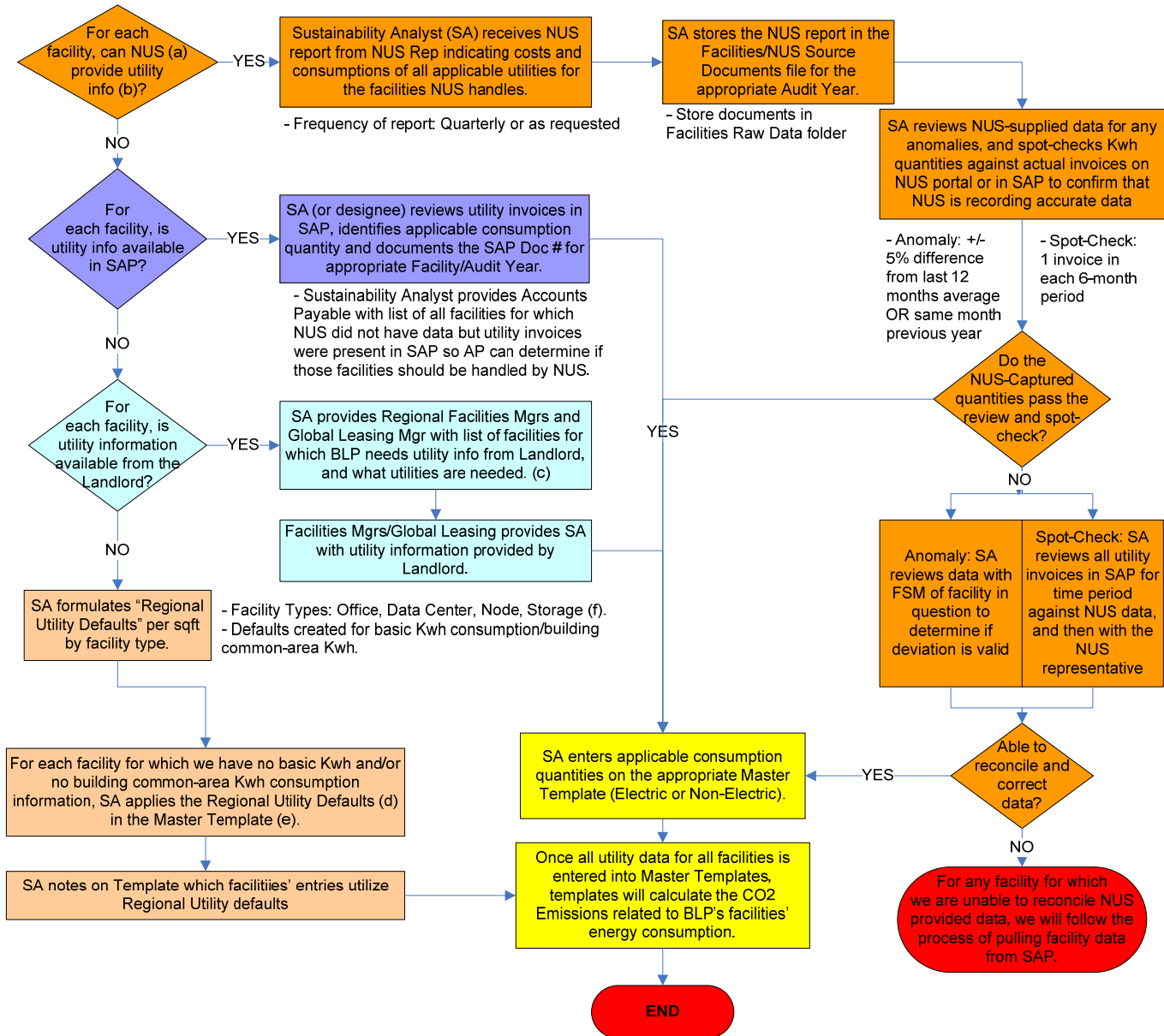
<b>GLOBAL FACILITES - PURCHASED KWH (Cont')</b>				
<b>Country</b>	<b>CO2 Grams/KWh</b>	<b>CH4 Grams/KWh</b>	<b>N2O Grams/KWh</b>	<b>CO2 Grams/KWh</b>
Kuwait	614	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Latvia	162	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Liechtenstein	27	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Lithuania	114	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Luxembourg	315	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Malaysia	656	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Mexico	440	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Netherlands	392	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
New Zealand	214	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Nigeria	403	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Norway	5	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Pakistan	451	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Panama	273	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Peru	225	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Philippines	487	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Poland	653	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Portugal	384	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Qatar	534	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Romania	417	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Russia	326	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Saudi Arabia	754	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Scotland (UK)	487	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Singapore	531	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Slovakia	217	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Slovenia	329	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
South Africa	835	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
South Korea*	459	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Spain	326	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Sri Lanka	420	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Sweden	40	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Switzerland	27	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Taiwan ("Chinese Taipei")	650	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Thailand	529	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Turkey	495	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
UAE	842	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
UK	487	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Ukraine	386	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Uruguay	307	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)

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<b>GLOBAL FACILITIES - PURCHASED KWH (Cont')</b>				
Country	<u>CO2</u> Grams/KWh	<u>CH4</u> Grams/KWh	<u>N2O</u> Grams/KWh	<u>CO2 Grams/KWh</u>
Venezuela	203	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)
Vietnam	413	0.0114	0.0090	IEA CO2 Emissions from Fuel Combustion – 2010 Ed. (2007-2008 Data)

<b>NON-ELECTRIC POWER</b>						
Source	Usage Measure	Co2 Conversion Formula(s)	CH4 Conversion Formula	N2O Conversion Formula	Assumptions	Source
Natural Gas	Therms	5,302 grams CO2 per Therm	5 grams/MMBtu 10 Therms = 1MMBtu	0.1 grams/MMBtu 10 Therms = 1MMBtu	HHV, 1,029 Btu/scf	"Climate Leaders GHG Inventory Protocol: Direct Emissions from Stationary Combustion", U.S. EPA, EPA430-K-08-003, May 2008
Steam	mlbs (thousand-lbs)	.0531/.92=.05772 MT CO2/Mil-Btu Steam: 1 mlbs*1170=1000BTUs	N/A	N/A	92% Efficiency, 700 degrees F Steam Temp	<a href="#">API Compendium</a>
Oil	Gallons	22.351 lbs CO2/Gallon	10 grams/MMBtu 1MMBtu = 7.194 Gallons	0.6 grams/MMBtu 1MMBtu = 7.194 Gallons	Distillate Fuel Oil, 5.825 MMBtu/barrel	"Climate Leaders GHG Inventory Protocol: Direct Emissions from Stationary Combustion", U.S. EPA, EPA430-K-08-003, May 2008

### 3.2.3 Flow Chart – Facilities Data Capture



**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, mlbs (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, Gallons of Oil, mlbs (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 energy 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

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

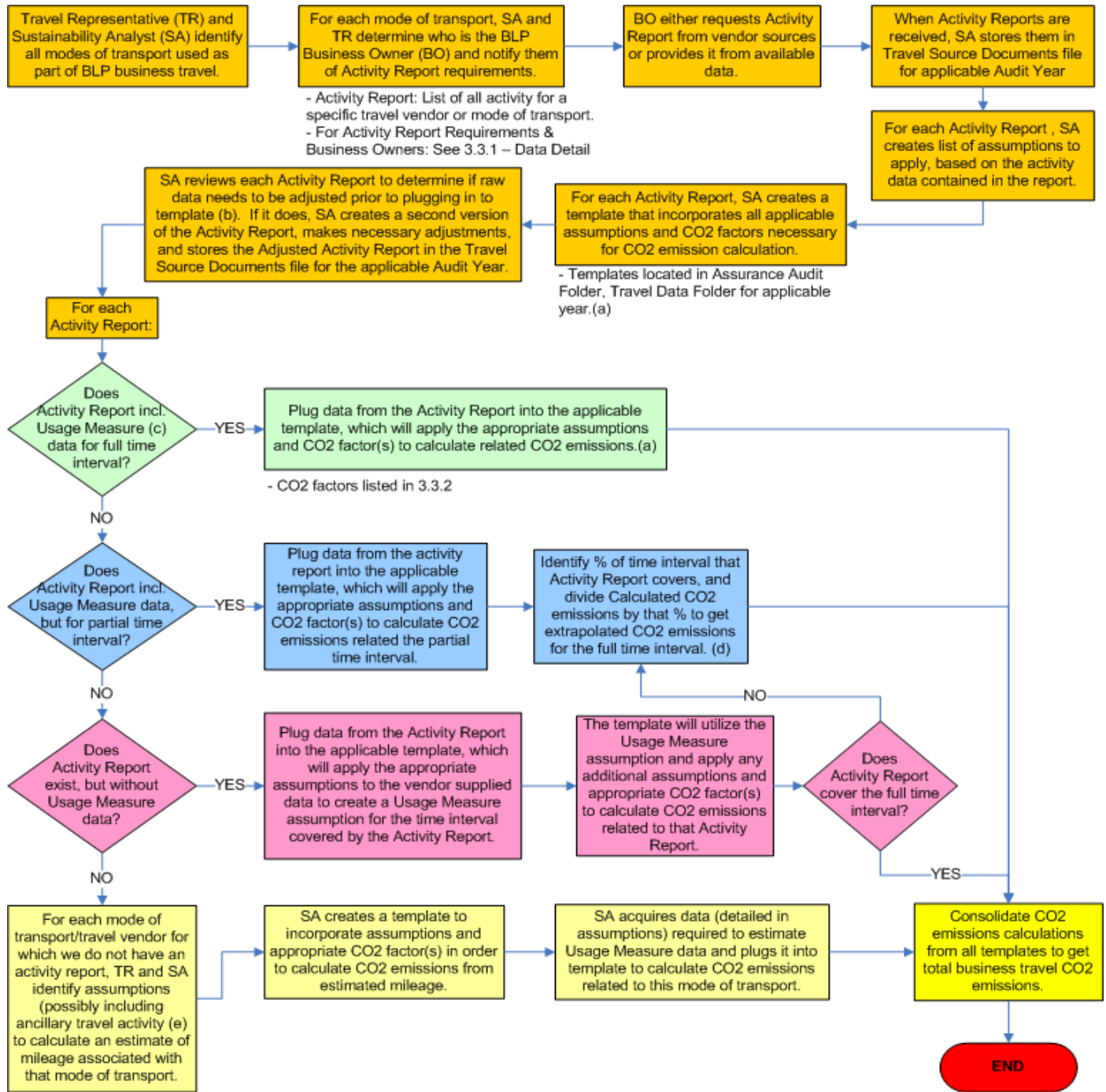
### 3.3.2 CO2 Factors

<b>BUSINESS TRAVEL</b>						
<b>Mode</b>	<b>Usage Measure</b>	<b>Add'l Description</b>	<b>CO2 (Kg) per Km</b>	<b>CO2 (Kg) per Mile</b>	<b>CO2 (Kg) per Gallon</b>	<b>Source</b>
Commercial Air	Passenger-Miles	Short (<500km) – Economy Class	0.1715	0.2760		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
		Medium (>500km, <1600Km) – Economy	0.0925	0.1489		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
		Medium (>500km, <1600Km) – Bus/First	0.1387	0.2232		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
		Long (>1600km) – Economy Class	0.0826	0.1329		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
		Long (>1600km) – Economy+ Class	0.1322	0.2128		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
		Long (>1600km) – Business Class	0.2396	0.3856		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
		Long (>1600km) – First Class	0.3305	0.5319		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
Private Aircraft	Gallons Fuel Consumed				8.3200	<a href="http://www.GHGProtocol.org">www.GHGProtocol.org</a>
US Rail (Amtrak)*	Passenger-Miles		0.0534	0.0859		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
UK Rail (Eurostar et. al.)	Passenger-Miles		0.0534	0.0859		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
Car Travel - Includes: Car Rental Car Service Taxi Field Svc Car Use	Miles Driven	Small Petrol-Powered Engine (= <1.4L)	0.1809	0.2911		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
	Miles Driven	Med. Petrol-Powered Engine (1.4L - 2.0L)	0.2139	0.3442		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
	Miles Driven	Large Petrol-Powered Engine (>2.0L)	0.2958	0.4760		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
	Miles Driven	Small Diesel-Powered Engine (= <1.4L)	0.1513	0.2435		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
	Miles Driven	Med. Diesel-Powered Engine (1.4L - 2.0L)	0.1881	0.3027		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
	Miles Driven	Large Diesel-Powered Engine (>2.0L)	0.258	0.4152		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
	Miles Driven	Medium Hybrid (Petrol/Electric)	0.1262	0.2031		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
	Miles Driven	Large Hybrid (Petrol/Electric)	0.2240	0.3605		<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>

\* We utilize the National Rail CO2 factor from the UK to calculate our US Rail emissions.



### 3.3.3 Flow Chart – Business Travel Data Capture



(a) For 2010, Commercial Air Travel template was created in Business Warehouse (BW) database of SAP. Applicable factors also reside in BW so CO2 associated with Commercial Air Travel is calculated within BW.

(b) For example: some Car Service 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.

(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 9 months,  $9/12=75\%$ , then divide calculated CO2 emissions by 75% to get extrapolated, full-year CO2 emissions.

(e) For example: For Taxi, since we have no systemized information about taxi usage, we relate 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

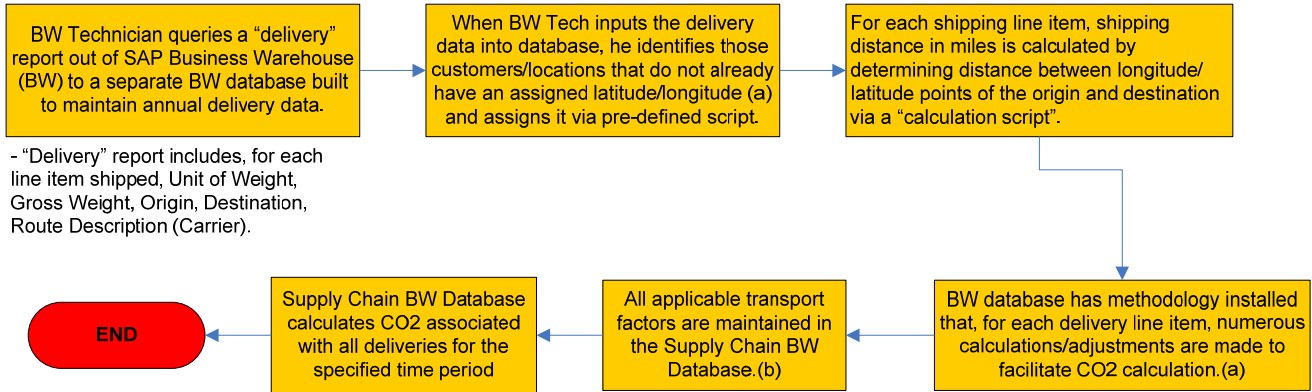
#### 3.4.1 Data Detail

SUPPLY CHAIN					
Source	Scope	Activity Report Requirements	Data Source	Data Completeness	Business Owner
Asset Mgmt. Freight Shipments	3	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).	SAP/Google Maps	Indirect	A. Tappan
BLP INK	3	Monthly report of packages sent, divided by Air vs. Ground, with average package weight and distance.	BLP INK	Direct Complete	J. Crusier
Markets (magazine) Distribution	3	Monthly reports detailing domestic distribution of the magazine, monthly circulation data	RR Donnelly	Indirect	J. Lauricella
Businessweek Distribution	3	Monthly reports detailing domestic distribution of the magazine, monthly circulation data	Businessweek Weekly Print Reports	Indirect	B. Schraml

#### 3.4.2 CO2 Factors

Supply Chain				
Source	Usage Measure	Add'l Description	CO2 (kg) per Km-MT	Source
Freight Shipments	Km-Tonnes	Road Shipments	0.1243	<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
		Air Freight - Short (<452km)	1.9607	<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
		Air Freight - Medium (452km - 1600km)	1.4739	<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
		Air Freight - Long (>1600km)	0.6132	<a href="http://www.DEFRA.gov.uk">www.DEFRA.gov.uk</a>
		Marine Freight	0.0100	<a href="http://www.GHGProtocol.org">www.GHGProtocol.org</a>
		Rail Freight	0.0287	<a href="http://www.GHGProtocol.org">www.GHGProtocol.org</a>

### 3.4.3 Flow Chart – Asset Management-Supply Chain Data Capture



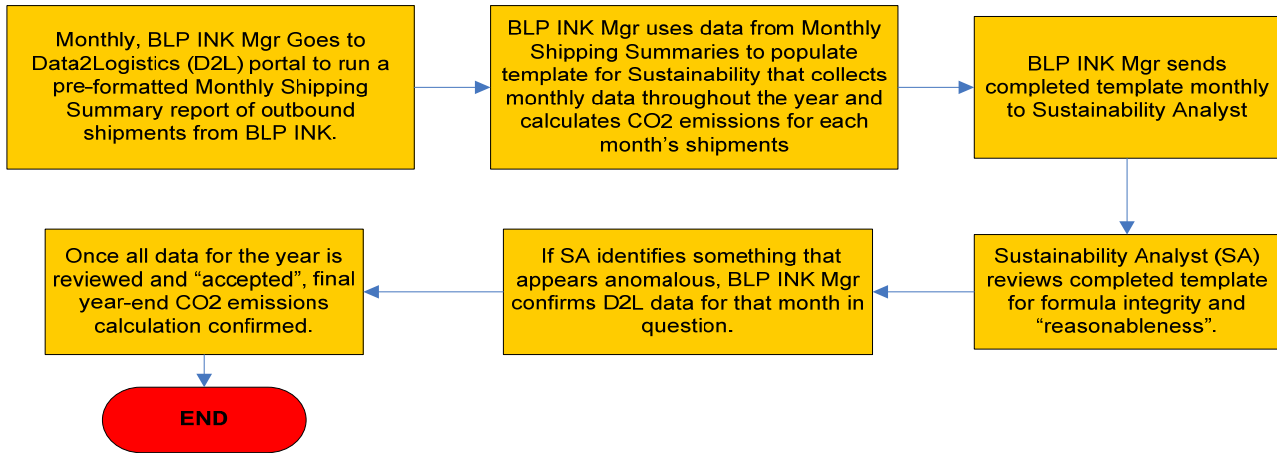
**NOTES:**

(a) Supply Chain BW Database performs the following data calculations/adjustments to facilitate CO2 calculation:

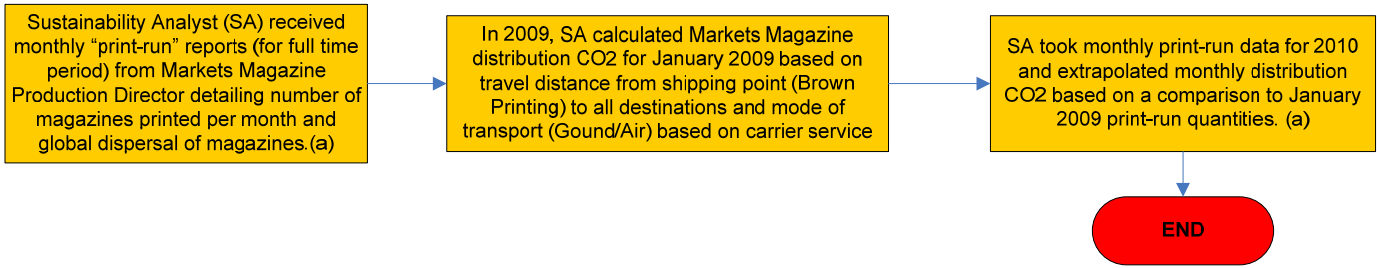
- Calculation to translate Gross Weight into Weight in MT
- Calculation to translate Distance in Miles to Distance in Km
- Creation of "Adjusted Distance" by adding 15% to Distance in Km for "consolidation"
- Application of Distance-Based & Carrier-Based assessment of transport mode.
- Application of "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.

### 3.4.4 Flow Chart – BLP INK-Supply Chain Data Capture

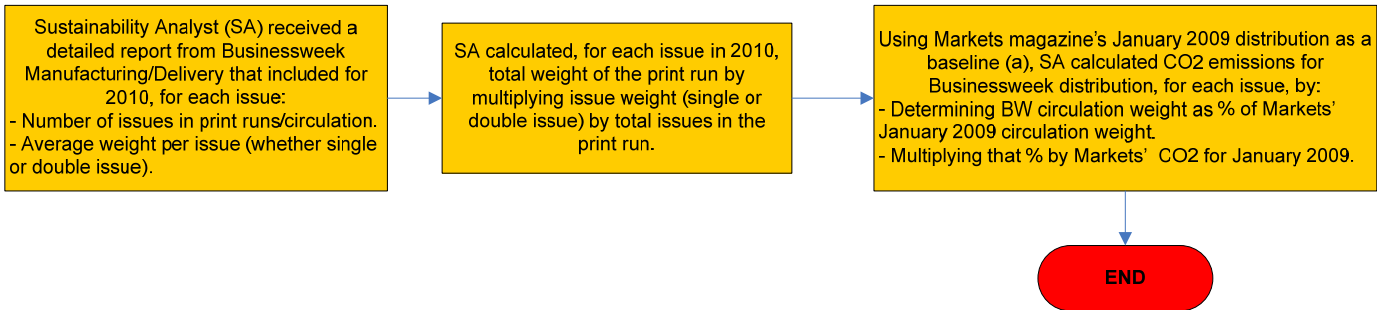


### 3.4.5 Flow Chart – Markets Magazine-Supply Chain Data Capture



**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



**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

Paper Consumption					
Source	Scope	Activity Report Requirements	Data Source	Data Completeness	Business Owner
Paper Consumption:	3	Paper types (including recycled content), quantities (in LBS) used/received,			
Markets Magazine			RR Donnelly	Direct Complete	P. Harris
Businessweek			Businessweek Manufacturing/Delivery	Direct Complete	B. Schraml
Other			Paper Vendor Reports	Direct Complete	P. Harris (US) A. Lok (Asia) S. Campbell (EMEA) C. Prandini (LatAm)

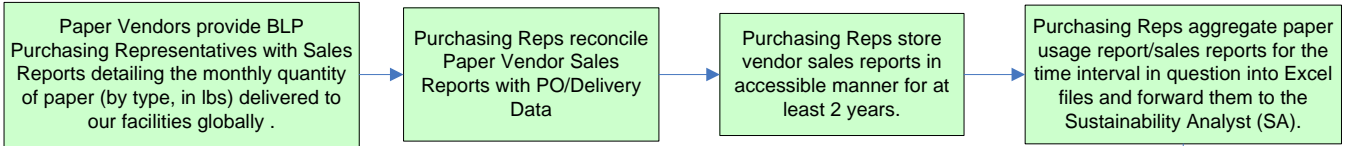
#### 3.5.2 CO2 Factors

Paper Consumption					
Source	Usage Measure	Description	PCW%	CO2e Emissions (Kg) per LB	Source
Paper Consumption	LBS Used*	Magazine ("Coated Groundwood")	50%	1.2267	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Magazine ("Coated Groundwood")	30%	1.3482	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Magazine ("Coated Groundwood")	10%	1.4696	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Magazine ("Coated Groundwood")	0%	1.5303	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Copier Paper ("Uncoated Freesheet")	100%	0.7762	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Copier Paper ("Uncoated Freesheet")	99%	0.7817	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Copier Paper ("Uncoated Freesheet")	80%	0.8878	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Copier Paper ("Uncoated Freesheet")	75%	0.9156	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Copier Paper ("Uncoated Freesheet")	70%	0.9436	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Copier Paper ("Uncoated Freesheet")	50%	1.0524	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Copier Paper ("Uncoated Freesheet")	30%	1.1667	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Copier Paper ("Uncoated Freesheet")	20%	1.2225	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Copier Paper ("Uncoated Freesheet")	10%	1.2783	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>
		Copier Paper ("Uncoated Freesheet")	0%	1.3341	<a href="http://www.edf.org/papercalculator/">http://www.edf.org/papercalculator/</a>

\* "LBS Used" includes waste that occurs during the magazine printing process

### 3.5.3 Flow Chart – Paper Consumption Data Capture

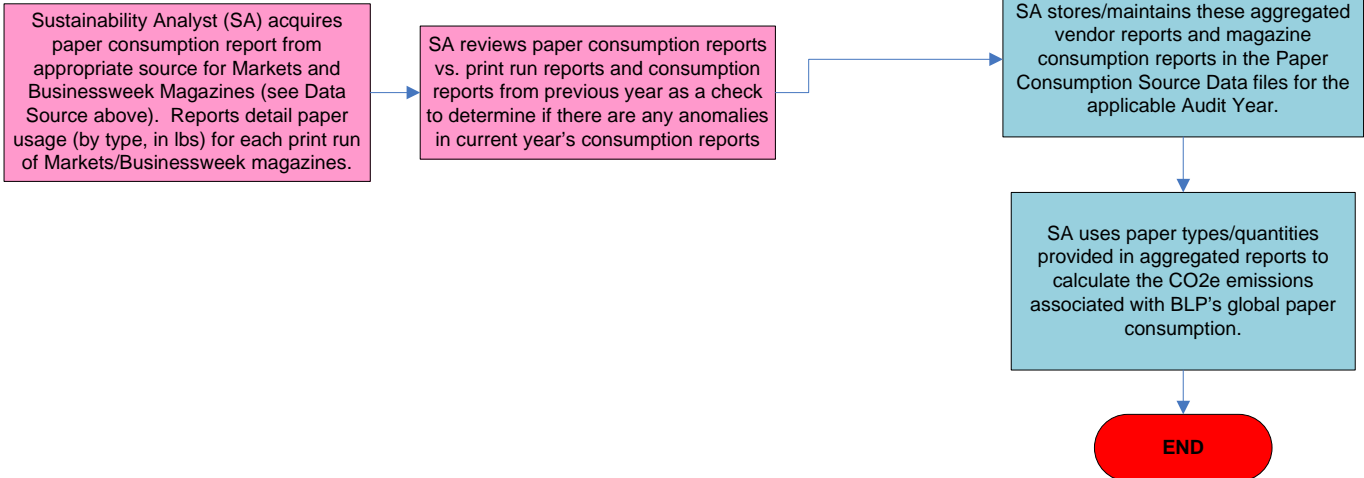
**FOR BLP INK/OFFICE USE**



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

NOTE: PO and delivery data are reconciled at the time of delivery for each delivery.

**FOR MAGAZINES:**



### 3.6 Appendix 6 – Waste

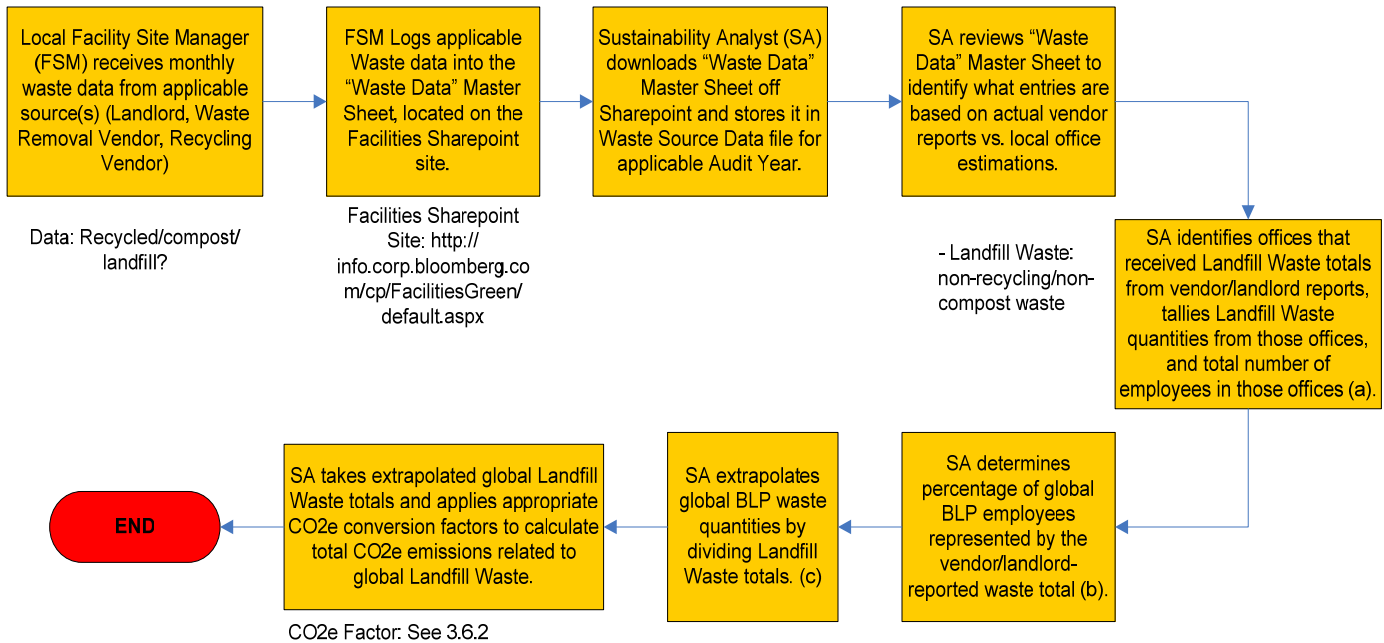
#### 3.6.1 Data Detail

Waste					
Source	Scope	Activity Report Requirements	Data Source	Data Completeness	Business Owner
Waste	3	Per office, Tons of non-recycling/non-compost waste (i.e. "Landfill Waste").	Waste Vendors and Landlords via Facility Site Managers (FSMs)	Direct Partial	M. Barry

#### 3.6.2 CO2 Factors

Waste					
Source	Usage Measure	Add'l Description	CO2e Emissions (Kg) per Ton	Source	
Waste	Tons of "Landfill" Waste	Non-Recycling/Non-Compost	997	U.S. EPA, "Solid Waste Management and Greenhouse Gases: A Life Cycle Assessment of Emissions and Sinks", 3 <sup>rd</sup> Edition, Washington, DC, September 2006.	

#### 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:  $5,000/10,000 = 50\%$ .  $100 \text{ tons}/50\% = \text{extrapolated global total of } 200 \text{ tons}$ .



***Sustainability Operations Guidelines***

*2008-2010*



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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.

# 2. Environmentally Preferred Purchasing Guidelines

## 2.1 Executive Summary

Bloomberg LP has a “Sustainability” initiative. Our 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 Carbon reduction 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 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. It fosters good will between employees and the public.
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”. Implementing environmentally preferred/green purchasing will aid Bloomberg in achieving their sustainability initiatives.
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:

- General Information

- Greenhouse Gas and Conservation Initiatives
- Products
- Services
- 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.

## **2.1.2 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.

### **2.1.2.1 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. Products are green if they contain reduced amounts of chemicals, are certified "Non-Toxic" or use Biodegradable liquids and non-toxic solids.

### **2.1.2.2 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 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.

### 2.1.2.3 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”.
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.
4. Are the goods manufactured using a “Sustainable” process? 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. Are goods manufactured locally? Are services performed by local providers? Transportation can greatly impact carbon emissions and defeat the good of procuring “environmentally preferred” products and services.
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 must meet and maintain ISO 14001 and OHSAS 18001 standards.
- Complete a Bloomberg Vendor Environmental Performance Survey questionnaire
- Verification by industry related third parties such as Energy Star, LEED, Greenseal 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”.

### 2.1.3 Recycled Content:

BLP requests that all vendors provide recycled content options for goods when available. If a product is available with recycled content, vendor should disclose that option to the appropriate BLP representative.

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.

### 2.1.4 Reporting:

BLP and/or vendor will record and track purchases on a monthly basis or as requested by BLP. The BLP personnel and/or vendor responsible for purchasing will report the company’s purchases to the appropriate BLP personnel using the provided Materials Purchasing Spreadsheet.

Vendor is required to track and report BLP purchases monthly. Vendor will use the BLP Materials Purchasing Spreadsheet or a BLP approved alternative reporting method.

Vendors shall be prepared to report on specific Bloomberg required attributes as per the Exhibit 5 - Materials Purchasing Spreadsheet.

The materials that do not meet the BLP adopted EPP specifications need to be approved by authorized 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 Engineering Hardware, Electronic Products and Appliances

- Reduced Greenhouse gas emissions from products.
- Reduce emissions from delivery of products.
- Regional manufacturing or assembly plants.
- Reduced power consumption.
- 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.
- Accepts printers, ink and toner with purchases.
- Asset Recovery Services (ARS) Commercial Asset Recovery Program.

#### 2.2.1.1 Requirement per LEED EB v2008 MRc2

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

BLP acknowledges the value of purchasing sustainable products and requires that our vendor's support that effort when appropriate and/or possible. BLP requests that vendor notify them of Energy Star and/or EPEAT opportunities that meet the above specifications as well as reduced packaging options.

### 2.2.2 Information Systems (IS)

The Scope of Green IS – as defined by Forrester

- Design
  - Create energy-efficient systems
  - Improve power handling efficiency
  - Build more manageable systems
- Manufacture
  - Clean up manufacturing processes



- Source from responsible suppliers
- Reduce use of hazardous substances
- Lessen impacts of packaging and transportation
- Operate
  - Manage PC and client devices
  - Cool data centers more efficiently
  - Actively manage application workloads
  - Incorporate green criteria into procurement
  - Source alternative energy and carbon offsets
  - Relocate or outsource data centers
- Dispose
  - Responsible disposal at end-of-life
  - Reuse and refurbish systems
  - Recycle consumables

### 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 Forest 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.
- Use Corrugated Pallets
- Green Cell™ 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 Metals

Products containing metals should be composed of 25% to 100% total recycled content (pre-consumer plus post-consumer).

## 2.2.6 Glues and adhesives

Specify Glues, Glue Sticks and Adhesives that are Certified AP Non-Toxic as they contain fewer harsh chemicals than non-certified products.

## 2.2.7 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 Appendix 10 Green Cleaning Policy, found in the RFP Template folder on the Purchasing Shared Drive, for additional information.

## 2.2.8 Lighting

- Specify Lamps that are energy efficient. The preferred specification should contain an Energy Star certification.
- Energy Star qualified Compact Fluorescents Lightbulbs (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.

### 2.2.8.1 Sustainable Purchasing of Light Bulbs With Reduced Mercury

Requirement per LEED EB v2008 MRc4

All lamps and light bulbs purchased by BLP for their facilities will comply with the minimum level of mercury content specified below. A minimum of 90% by cost of all light bulb purchases will meet the reduced mercury specifications. Monthly purchasing reports will track the lighting program progress and identify barriers to meeting the mercury content objective.

BLP acknowledges the value of purchasing sustainable products and requires that vendor support that effort as it relates to supplying light bulbs and lamps to BLP. BLP requests that vendor notify them of product alternatives that meet specifications in the following table, as well as reduced packaging options when available.

(LEED for High Performance Operations v2008)

## 2.2.9 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

## 2.2.10 Furniture and Furnishings

Sustainable Purchasing of Furniture:

When purchasing new furniture, BLP will look for items with the following characteristics: 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 contents. 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.

### **2.2.11 Signage**

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

### **2.2.12 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.

### **2.2.13 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.

### **2.2.14 Sustainable Food Purchasing**

- Requirement per LEED EB v2008 MRc5  
Please refer to the LEED EB requirements for specific requirements.

## 3. Sustainable Electronics Manufacturing Policy

### 3.1 Executive Summary

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

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

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

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

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

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

**Management Practices** - Bloomberg contracts with electronic assemblers to build our Flat Panel, Keyboard and b-Unit products. The contracted assemblers procure the raw materials, individual components and subassemblies to Bloomberg's specification or receive such items from Bloomberg. By contract, and in some cases by Law, the contract assembler cannot substitute or deviate from our supplied specification of acceptable materials and components. This specification is called a **Bill of Materials or BOM**. By controlling the BOM, we diminish our environmental impact by specifying to the extent practicable eco-friendly materials. By choosing and contracting with reputable manufacturers, we can impose green manufacturing practices as part of our manufacturing agreement.

**Measurement Practices** – Bloomberg will score all of its proprietary products and evaluate the impact on the environment using a scorecard similar to the scorecard used by Green Peace in order to compare its products to those found within the industry.

## 3.2 Chemical & Toxics Reduction/Materials Selection

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

Bloomberg will take every possible effort to ensure that all proprietary branded products are designed without toxic components, chemicals or elements in the product composition or manufacturing process. These chemicals include but are not limited to:

- PVC, BFR, all phthalates, beryllium (including alloys & compounds), antimony & antimony compounds
- Additionally, Bloomberg will work to eliminate all chrome<sup>1</sup> 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.

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<sup>1</sup> 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

### 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.)

#### 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 scrapper, to whom we regularly send equipment for resale, dismantling, recycling and/or disposal. The main benefit of our relationship with SMT is that they dismantle our Flat Panels, test/resell the LCD glass, and finally dispose of the e-waste in an environmentally sound way. SMT is an EPA registered e-scrap recycler and is ISO 14001, OHSAS 18001, and ISO 9001 compliant. See Exhibit 3 for a sample agreement relating to the processing and resale of equipment. Please contact the Bloomberg legal department for the most current version of this agreement.

### 3.3.3 WEEE – Waste Electrical and Electronic Equipment

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

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

In order of importance we would like those within Bloomberg who handle e-waste in North America 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>
  - [http://www.ban.org/pledge/downloads/e-Recyclers\\_standards\\_comparison.pdf](http://www.ban.org/pledge/downloads/e-Recyclers_standards_comparison.pdf)
2. **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.

<http://www.idc.com/getdoc.jsp?containerId=prUS21340408>

### 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)
- <http://www.eiae.org/faqs.php>

#### 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 (GOLD) 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 graphic design considers the environmental impacts of graphic design 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; using paper and materials made with recycled, post-consumer waste; printing with low-VOC and non-toxic 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 CUBE-D projects are created in the most sustainable way possible. There are times, however, when CUBE-D 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 environmentally harmful ink.** If 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.
- **Source paper that has at least 30% Post Consumer Waste** and if you must use virgin pulp paper ensure that it comes from FSC sustainable resources.
  - 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
- **Source paper and other materials from reasonable geographic distance** to save energy (fuel consumption in transport) whenever that option exists.
- 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
- **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.
- **Specify the most eco-friendly paper possible:** Totally chlorine free-TFC, post industrial recycled content, post consumer recycled content, FSC certified, recycled fabric content, or tree-free paper (i.e. Kenaf or Hemp)
- Use the **optimum sizes** for your layout of documents given the press size.
- Try to **use inks and paper that are left over** 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

- **Have vendors' complete required form** detailing all materials by weight and percentage, used to produce materials, so we can properly track and quantity carbon footprint of every project.2

## 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 the proper print vendor will reduce the impact that an organization has on the environment and save time and money.

### 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 CUBED is NOT involved, specify paper:
  - with a MINIMUM of 30% PCW (Post Consumer Waste)
  - and for recycled white paper, "process chlorine free" paper
- Whenever possible, the chosen printer should be FSC certified and/or use FSC certified paper
- If possible, request that your print job be produced with non-toxic, non-metallic, vegetable or soy based ink that is low VOC
- Ask the vendor how they dispose of the ink they use
- If possible, a visit to the facility should be done
- Ask if the vendor uses no-process printing plates
- 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
- Ensure the requested paper is stocked locally and additional shipping from long distances is not required
- Request a carbon neutral printing process when available. Otherwise identify whether vendor uses alternative energy to power their equipment
- Duplex (double-sided) laser printing is preferred option unless design is restrictive.
- Printers should be able to provide at least one of the third party certifications identified below:

### 5.3 Third Party Certification Labels



## 6. Green Construction Policy

### 6.1 Executive Summary

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

Bloomberg L.P. (BLP) 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.
- If the building undergoes a tenant improvement, develop and implement an IAQ Management plan for the pre-occupancy phases as follows:
  - Upon completion of construction and installation of interior finishes, contractor shall install new filtration media and flush-out the affected space by supplying a total air volume of 14,000 cu.ft. of outdoor air per sq.ft. of floor area while maintaining an internal temperature of at least 60°F and, where mechanical cooling is operated, relative humidity no higher than 60%.
  - The affected space may only be occupied following delivery of a minimum of 3,500 cu.ft. of outdoor air sq. ft. of floor area to the space, and provided the space is ventilated at minimum rate of 0.30 cfm/sq.ft. of outside air or the design minimum outside air rate, whichever is greater, a minimum of three hours prior to occupancy and during occupancy, until the total of 14,000 cu.ft./sq.ft. of outside air has been delivered to the space.
- Upon the completion of construction, HVAC and lighting systems must be returned to the designed or modified sequence of operations
- Protect stored on-site or installed absorptive materials from moisture damage.

### 6.3.2 Best Practices

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

## 6.4 HVAC Protection

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

## 6.5 Source Control

- When feasible use low emitting products (i.e. low emitting Volatile Organic Compounds – VOC's).

## 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-11 products

<http://www.greenseal.org/findaproduct/index.cfm> or products that comply with the California Code of Regulations [http://www.arb.ca.gov/enf/title17\\_94509.pdf](http://www.arb.ca.gov/enf/title17_94509.pdf) maximum allowable VOC levels. All disposable janitorial paper and trash bags shall comply with the U.S. EPA's Comprehensive Procurement Guidelines. Additionally contractors should:

- Use electrically powered equipment (such as fork lifts and chain saws) when feasible and use bottled gas instead of diesel for equipment such as generators or fork lifts.
- 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

## 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 over all 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

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>

### 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> 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 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 and constitutes a minimum of 25% of the finished floor area [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. Solid 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, 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, 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 for reuse or recycling.

###### *Material Reuse:*

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

###### *Paper Reduction:*

- Measure paper purchase and use at the beginning of each quarter and set a reduction goal for the following quarter(s).
- Use as appropriate electronic file systems for personnel forms, timesheets, manuals, etc.
- Employ standard practice to ensure that documents are printed double-sided.
- Require RFP bid submissions to be double-sided and submitted without extraneous materials.
- Reduce junk mail through the following practices:
  - Provide information on how to reduce the amount of junk mail received within the corporation and at employee's homes.
  - Employees are encouraged to review the information provided by [Direct Marketing Association](http://www.dmchoice.org) ([www.dmchoice.org](http://www.dmchoice.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

**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.
- Recover all wood pallets, and plastic shipping containers for reuse or recycling. Specify the use of reusable pallets and shipping containers for future purchases.

**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.

**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.

In addition to complying with any applicable statewide electronic recycling efforts, consult the information provided by the [StEP Initiative](http://www.step-initiative.org) Solving the E-waste Problem ([www.step-initiative.org](http://www.step-initiative.org)) for guidance in disposing of electronic waste and/or for manufacturer and provided takeback 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.

Periodically 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 with other 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 fundamental 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. The cleaning products used must meet [Green Seal's GS-37 standard \(Appendix A- GS-37 Standard\)](#) (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.
- C. In order to reduce packaging waste, concentrated cleaning products will be utilized when available and feasible.
- D. 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.

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

#### **Level 1 - Orderly Spotlessness**

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

#### **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 and pencil sharpeners have old trash and shavings. 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 and pencil sharpeners 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 deem 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.

- 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.

### **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. Warehouses represent 1,113 tons and 2% of our non- Data Center Facilities Carbon footprint.

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
- Where possible, warehouses should engage their local hauler to develop a composting program for biodegradable waste
- Warehouses should utilize supplies from easily re-usable resources, for example plastic skids instead of wooden skids

#### 10.2.2 Electronic Waste Disposal

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

### 10.3 Waste Tracking

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

### 10.4 Packaging

Warehouses, in coordination with Bloomberg Engineering and Asset Management, should continually seek ways to reduce, reuse and recycle packaging; eliminate petroleum based materials; increase recycled packaging content; and push back on high volume vendors to do the same.



## 10.5 Lighting

Warehouses are typically vast buildings consisting of large square footage areas. In order to minimize the electrical demand on the facility, warehouses should install lighting sensors which detect movement within aisles or areas as lighting is needed. Areas which are unoccupied for a half hour should automatically turn their lights off until movement in that area is again realized. This investment will reduce electricity demand and costs while reducing the warehouses impact on our carbon footprint

## 10.6 Cleaning

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

# 11. Corporate Green Events 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

The following will serve as a guide to ensure all Bloomberg events, whether hosted internally (I) or hosted externally (E)<sup>3</sup> are executed in the most sustainable way. There will be times, when the Events Team may not be able to go with the eco-friendly alternative, however all sustainable options must be examined before a non-eco friendly option is chosen. Below is a checklist of areas in which sustainability should be taken into account:

### 11.2.1 Venue Selection

- **Venues with sustainable initiatives (E)**: Bloomberg should request sustainable services from the venues with which Bloomberg already maintains a relationship. If the standard site does not have sustainable options, seek out boutique hotels, restaurants and caterers that can incorporate their own sustainability initiatives into an event.
- **Choose locations which demand less travel from all attendees (E)**: Venues should be close to the offices of our target audience to allow for less traveling. Sites should be close to public transportation so that guests do not have to drive. In the event that a distant location is chosen, consider shuttle options.

### 11.2.2 Vendor Selection

- **Requests for Proposals (I, E)**: To ensure that Bloomberg gets the best pricing and creative ideas, each project requiring outside vendors, i.e., production companies is bid out to several companies. Each RFP should include the appropriate sustainability guidelines for the vendor to review and Bloomberg must require that vendors and subcontractors adhere to those guidelines. This ensures that all vendors working on Bloomberg events are aware of, and have a vested interest in making sure the project is environmentally friendly.

### 11.2.3 Catering

- **Source local, sustainable or organic food (I, E)**: Most caterers will have contacts with local farms and artisanal producers. Choosing seasonal food items that are grown, raised or produced locally is a better option than sourcing organic food from a different region of the country. The Events team should work

<sup>3</sup> (E) next to bullet point indicates relativity to an external event

(I) next to bullet point indicates relativity to an internal event

with the vendor to ensure that at least 25% of the food incorporates this requirement. Food orders, aside from soft beverages, should only be made for events lasting longer than four hours, excepting those with networking receptions.

- **Serving Pieces & Cutlery (I, E):** Bloomberg events staff should routinely review all serving pieces with the caterer. Use re-usable cutlery and dishware whenever possible. If disposables are more appropriate for the event, then all steps possible should be taken to use biodegradable wares (i.e. potato based, corn based or compostable pulp materials are preferred)
- **Bar (I, E):** Domestic and if possible, local wines are preferable. In regards to specialty drinks, seasonal fruit and/or other additions should be considered.
- **Leftovers (I):** Most caterers should have contacts with organizations so leftover food is donated to food banks or homeless shelters. Whenever possible this should be leveraged.

#### 11.2.4 Décor

- **Flowers (I, E):** *Floral arrangements are typically not used for special events as they are expensive and do not create much impact or add much value to the event. Be more creative in terms of designing centerpieces or added décor. Use sustainable resources such as rocks and water, grass, fruits or spices to create dramatic décor for events.*
- **Signage (I, E):** *Signage isn't typically used at Bloomberg events. It is preferable to use create temporary signage with lighting, LCD screens or vinyl stickers. However in cases where signage investments are needed:*
  - Purchased signage (e.g. banners, pop-up signs, islands, terminal pods) should be refurbished or reused before purchasing new items. When purchasing is necessary, work with the purchasing department to find sustainable alternatives.
- **Lighting (I, E):** *LED lighting systems use less energy, are cool to touch and can be configured to PMS colors to create more impactful and efficient lighting. Lighting vendors should be consulted as to the most energy efficient options. For outdoor events, consider solar.*

#### 11.2.5 Audio/Visual

- **Use energy saving electronics (I, E):** Request Energy Star or Energy Smart electronics from in-house AV services. If Energy Star or Energy Smart are not available, newer equipment is typically more efficient than older equipment.
- **Efficiency (I, E):** Review sound and video plans with vendors or hotel staff to ensure that we are only using the amount of equipment necessary

#### 11.2.6 Marketing and Distribution

- **Document Management (I, E):** Refrain from excessive marketing distribution by e-mailing attendees with follow-up documents and by creating customized documents when there is adequate lead time. When working with various organizations, limit hand-out items per speaker or organization unless absolutely necessary.
- **Create awareness (I):** Use the approved title slide for all in-house events with BGREEN certified logo (to be created).
- **Limit the event topics (E):** Reduce the amount of travel for Bloomberg sales and specs by limiting events to one asset class or topic where possible.

#### 11.2.7 Premium Items

- Refrain from distributing premiums unless warranted and be mindful of shipping. Use creative ways to distribute premium items so that clients take only if necessary.

#### 11.2.8 Invitations

- Work with CUBE-D designers to determine if your event can utilize electronic invitations in lieu of paper invitations. E-Vites and E-Cards are the best options, however, if paper invitations are necessary, CUBE-D can provide the most sustainable option

### **11.2.9 Reuse**

- *Corporate Events have a large inventory of décor items and furniture from previous events. When possible reuse these items. This was the case for the 2008 BOB Holiday Program when items from previous years were reused as décor for CLUB BOB.*

## 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 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).



# Bloomberg

## LIST OF PROJECTS BY BUSINESS AREA

Department	Initiative Description	Project count	FTE Hours	Project Costs	Project Savings	Net Costs / (Savings)
<b>Asset Management</b>		<b>32</b>	<b>565</b>	<b>\$ 8,220</b>	<b>\$ (2,173,032)</b>	<b>\$ (2,164,812)</b>
	Examine/Mitigate BLP Employees' Environmental Impact	1	15	\$ 1,220	\$ -	\$ 1,220
	Examine/Mitigate Downstream (Customer) Environmental Impact	3	5	\$ -	\$ -	\$ -
	Examine/Mitigate Upstream (Vendor) Environmental Impact	2	60	\$ 7,000	\$ -	\$ 7,000
	Improve Internal Communication (Management, Employees, Partners)	4	27	\$ -	\$ -	\$ -
	Improve Operating Efficiencies	7	180	\$ -	\$ (2,152,943)	\$ (2,152,943)
	Internal Services (transport, etc.)	1	-	\$ -	\$ -	\$ -
	Reduce Company Waste	10	215	\$ -	\$ (20,089)	\$ (20,089)
	Strategy/Analysis	4	63	\$ -	\$ -	\$ -
<b>Bloomberg BusinessWeek</b>		<b>1</b>	<b>-</b>	<b>\$ 434,874</b>	<b>\$ (65,000)</b>	<b>\$ 369,874</b>
	Examine/Mitigate Downstream (Customer) Environmental Impact	1	-	\$ 434,874	\$ (65,000)	\$ 369,874
<b>Bloomberg Ink</b>		<b>18</b>	<b>(10)</b>	<b>\$ 19,992</b>	<b>\$ (912,120)</b>	<b>\$ (892,128)</b>
	Improve Internal Communication (Management, Employees, Partners)	2	20	\$ -	\$ -	\$ -
	Improve Operating Efficiencies	6	(210)	\$ -	\$ (912,120)	\$ (912,120)
	Reduce Company Waste	9	177	\$ 19,992	\$ -	\$ 19,992
	Strategy/Analysis	1	3	\$ -	\$ -	\$ -
<b>Bloomberg Press</b>		<b>12</b>	<b>55</b>	<b>\$ 700</b>	<b>\$ (12,825)</b>	<b>\$ (12,125)</b>
	Examine/Mitigate Downstream (Customer) Environmental Impact	1	-	\$ 700	\$ -	\$ 700
	Examine/Mitigate Upstream (Vendor) Environmental Impact	3	10	\$ -	\$ -	\$ -
	Reduce Company Waste	3	10	\$ -	\$ -	\$ -
	Strategy/Analysis	5	35	\$ -	\$ (12,825)	\$ (12,825)
<b>Sustainability</b>		<b>48</b>	<b>1,557</b>	<b>\$ 3,445,784</b>	<b>\$ (121,670)</b>	<b>\$ 3,324,114</b>
	Examine/Mitigate BLP Employees' Environmental Impact	1	12	\$ -	\$ -	\$ -
	Examine/Mitigate Upstream (Vendor) Environmental Impact	3	-	\$ 74,000	\$ -	\$ 74,000
	Improve External Communication (NGOs, Govt, Communities, Press)	4	-	\$ 219,068	\$ -	\$ 219,068
	Improve Internal Communication (Management, Employees, Partners)	19	1,500	\$ 120,349	\$ -	\$ 120,349
	Improve Operating Efficiencies	1	-	\$ 256,710	\$ -	\$ 256,710
	Purchased Renewables/Offsets	4	-	\$ 1,525,368	\$ -	\$ 1,525,368
	Reduce Water Consumption	1	-	\$ -	\$ -	\$ -
	Strategy/Analysis	15	45	\$ 1,250,289	\$ (121,670)	\$ 1,128,619
<b>Engineering</b>		<b>20</b>	<b>105</b>	<b>\$ 239,987</b>	<b>\$ (1,036,341)</b>	<b>\$ (796,354)</b>
	Examine/Mitigate Downstream (Customer) Environmental Impact	11	80	\$ 239,987	\$ (244,860)	\$ (4,873)
	Improve Customer Communication	1	-	\$ -	\$ -	\$ -
	Improve Internal Communication (Management, Employees, Partners)	2	-	\$ -	\$ -	\$ -
	Improve Operating Efficiencies	2	-	\$ -	\$ (589,481)	\$ (589,481)
	Reduce Company Waste	2	-	\$ -	\$ (202,000)	\$ (202,000)
	Strategy/Analysis	2	25	\$ -	\$ -	\$ -

# Bloomberg

Department	Initiative Description	Project count	FTE Hours	Project Costs	Project Savings	Net Costs / (Savings)
<b>Facilities &amp; Design</b>		<b>98</b>	<b>2,550</b>	<b>\$ 4,009,677</b>	<b>\$ (14,088,215)</b>	<b>\$ (10,078,538)</b>
	Examine/Mitigate BLP Employees' Environmental Impact	1	20	\$ -	\$ -	\$ -
	Improve Internal Communication (Management, Employees, Partners)	6	508	\$ 295,000	\$ -	\$ 295,000
	Improve Operating Efficiencies	59	1,226	\$ 2,687,755	\$ (12,120,004)	\$ (9,432,249)
	Internal Services (transport, etc.)	1	16	\$ -	\$ -	\$ -
	Purchased Renewables/Offsets	1	8	\$ -	\$ -	\$ -
	Reduce Company Waste	15	414	\$ 659,227	\$ (1,522,629)	\$ (863,402)
	Reduce Water Consumption	3	31	\$ 239,200	\$ (445,582)	\$ (206,382)
	Strategy/Analysis	12	327	\$ 128,495	\$ -	\$ 128,495
<b>Global Real Estate</b>		<b>19</b>	<b>289</b>	<b>\$ 62,636</b>	<b>\$ -</b>	<b>\$ 62,636</b>
	Examine/Mitigate Upstream (Vendor) Environmental Impact	3	34	\$ -	\$ -	\$ -
	Improve Internal Communication (Management, Employees, Partners)	6	79	\$ 6,490	\$ -	\$ 6,490
	Improve Operating Efficiencies	4	130	\$ -	\$ -	\$ -
	Internal Services (transport, etc.)	3	16	\$ 30,146	\$ -	\$ 30,146
	Strategy/Analysis	3	30	\$ 26,000	\$ -	\$ 26,000
<b>Information Systems</b>		<b>18</b>	<b>408</b>	<b>\$ 5,367</b>	<b>\$ (3,839,858)</b>	<b>\$ (3,834,491)</b>
	Improve Internal Communication (Management, Employees, Partners)	1	16	\$ -	\$ -	\$ -
	Improve Operating Efficiencies	8	200	\$ -	\$ (3,839,858)	\$ (3,839,858)
	Reduce Company Waste	1	10	\$ 5,367	\$ -	\$ 5,367
	Strategy/Analysis	8	182	\$ -	\$ -	\$ -
<b>Marketing</b>		<b>19</b>	<b>815</b>	<b>\$ 125,000</b>	<b>\$ (3,511,121)</b>	<b>\$ (3,386,121)</b>
	Examine/Mitigate Upstream (Vendor) Environmental Impact	2	8	\$ -	\$ (100,000)	\$ (100,000)
	Improve Customer Communication	1	10	\$ -	\$ -	\$ -
	Improve External Communication (NGOs, Govt, Communities, Press)	1	25	\$ 125,000	\$ -	\$ 125,000
	Improve Internal Communication (Management, Employees, Partners)	8	360	\$ -	\$ (908,571)	\$ (908,571)
	Improve Operating Efficiencies	1	15	\$ -	\$ -	\$ -
	Reduce Company Waste	1	150	\$ -	\$ (1,258,348)	\$ (1,258,348)
	Strategy/Analysis	5	247	\$ -	\$ (1,344,202)	\$ (1,344,202)
<b>Markets Magazine</b>		<b>19</b>	<b>200</b>	<b>\$ 405,000</b>	<b>\$ (1,773,756)</b>	<b>\$ (1,368,756)</b>
	Examine/Mitigate Downstream (Customer) Environmental Impact	3	15	\$ -	\$ -	\$ -
	Examine/Mitigate Upstream (Vendor) Environmental Impact	1	5	\$ -	\$ -	\$ -
	Improve Internal Communication (Management, Employees, Partners)	1	10	\$ -	\$ -	\$ -
	Improve Operating Efficiencies	3	40	\$ -	\$ -	\$ -
	Reduce Company Waste	10	130	\$ 405,000	\$ (1,673,756)	\$ (1,268,756)
	Strategy/Analysis	1	-	\$ -	\$ -	\$ -
<b>Multimedia - Broadcast Operations</b>		<b>12</b>	<b>234</b>	<b>\$ -</b>	<b>\$ (143,399)</b>	<b>\$ (143,399)</b>
	Improve Internal Communication (Management, Employees, Partners)	2	25	\$ -	\$ -	\$ -
	Improve Operating Efficiencies	8	166	\$ -	\$ (143,399)	\$ (143,399)
	Strategy/Analysis	2	43	\$ -	\$ -	\$ -

# Bloomberg

Department	Initiative Description	Project count	FTE Hours	Project Costs	Project Savings	Net Costs / (Savings)
Network/Comms/GTEC/SWQA		5	24	\$ -	\$ -	\$ -
	Examine/Mitigate Downstream (Customer) Environmental Impact	1	8	\$ -	\$ -	\$ -
	Improve Internal Communication (Management, Employees, Partners)	1	8	\$ -	\$ -	\$ -
	Improve Operating Efficiencies	2		\$ -	\$ -	\$ -
	Strategy/Analysis	1	8	\$ -	\$ -	\$ -
Professional Development		21	580	\$ 21,459	\$ -	\$ 21,459
	Improve External Communication (NGOs, Govt, Communities, Press)	3	65	\$ -	\$ -	\$ -
	Improve Internal Communication (Management, Employees, Partners)	12	395	\$ 4,700	\$ -	\$ 4,700
	Internal Services (transport, etc.)	1	50	\$ -	\$ -	\$ -
	Strategy/Analysis	5	70	\$ 16,759	\$ -	\$ 16,759
Public Relations		5		\$ -	\$ -	\$ -
	Improve Customer Communication	1		\$ -	\$ -	\$ -
	Improve External Communication (NGOs, Govt, Communities, Press)	3		\$ -	\$ -	\$ -
	Improve Internal Communication (Management, Employees, Partners)	1		\$ -	\$ -	\$ -
Purchasing		17	685	\$ -	\$ (330,158)	\$ (330,158)
	Examine/Mitigate Downstream (Customer) Environmental Impact	2	-	\$ -	\$ -	\$ -
	Examine/Mitigate Upstream (Vendor) Environmental Impact	3	75	\$ -	\$ -	\$ -
	Improve Internal Communication (Management, Employees, Partners)	4	105	\$ -	\$ -	\$ -
	Improve Operating Efficiencies	4	315	\$ -	\$ -	\$ -
	Purchased Renewables/Offsets	3	185	\$ -	\$ (330,158)	\$ (330,158)
	Strategy/Analysis	1	5	\$ -	\$ -	\$ -
R&D		13	2,306	\$ 5,000	\$ (28,603)	\$ (23,603)
	Improve Operating Efficiencies	3	504	\$ -	\$ (28,603)	\$ (28,603)
	Strategy/Analysis	10	1,802	\$ 5,000	\$ -	\$ 5,000
Travel		15	62	\$ -	\$ (6,421,930)	\$ (6,421,930)
	Improve Internal Communication (Management, Employees, Partners)	3	15	\$ -	\$ -	\$ -
	Improve Operating Efficiencies	9	40	\$ -	\$ (6,421,930)	\$ (6,421,930)
	Strategy/Analysis	3	7	\$ -	\$ -	\$ -
Grand Total		392	10,425	\$ 8,783,696	\$ (34,458,028)	\$ (25,674,332)

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Asset Management 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	(77.7%)
2010 \$ Spend/(Savings)	(\$405,300)

#### Department Overview

Bloomberg has approximately 300 inventory locations it manages throughout the world. These include 3 major distribution centers in New York, London and Tokyo as well as smaller warehouses and critical spares sites supporting our customers, node sites and offices. Flat panels, Keyboard and B-unit components are purchased from around the world and manufactured/assembled in the US, Mexico and Canada. We then distribute these finished products globally to fulfill customer demand. In 2010, Asset Mgmt shipped 404,416 line items; accounting for 4,628 metric tonnes transported - emitting just approximately 2,048 metric tonnes of CO<sub>2</sub>.

#### Departmental Wins

1. 19 inch Flat Panel received Energy Star certification
2. Identified alternative scrappers and recyclers in Australia and South America for disposal of e-waste
3. Partnered with Sustainability Team to conduct a Life Cycle Analysis (LCA) on its corporate Flat Panel
4. Conducted employee e-waste disposal drives
5. Elimination of Styrofoam packaging and movement towards more sustainable packaging options

#### Challenges

1. Lack of quality and reputable e-waste scrappers in small volume locations, specifically Asia
2. No suitable means of assessing carbon impact from Network Optimization program
3. Further carbon reductions from shifts to lower carbon emitting methods of transportation are limited as only 10% of shipments are via air freight

#### Future Initiatives

Asset Management will continue to track reductions from battery distribution, eliminate unnecessary mail distribution, focus on re-selling or salvaging of obsolete merchandise and identify opportunities to reduce carbon associated with freight. Work continues on the Network Optimization project; identifying the best medium for us to ship materials globally, additional opportunities to strategically warehouse merchandise, limit air shipments, and materially reduce overall costs. However at this time, there continues to be no immediate focus on adding carbon as a variable – it is assumed that reduced cost and reduced air travel will result in a reduction in carbon. The department has moved away from Styrofoam packaging for keyboards. The next evolution in packaging will be bio-based and completely biodegradable manufactured from agricultural waste and cotton industry by-products, which we are currently evaluating. Asset management will continue to assist in Life Cycle Assessment Audits of Bloomberg proprietary products – Flat Panels, Keyboards, B-Units, coordinate internal asset disposal drives and work towards e-Stewards certification.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Bloomberg Ink 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	(57.2%)
2010 \$ Spend/(Savings)	(\$267,554)

#### Department Overview

Bloomberg Ink is the company's in-house print facility. They print over 11 million pieces every year - business cards, nameplates, stationary, brochures, etc. - and ship approximately 100,000 packages around the globe to customers and international offices. INK works closely with Marketing to print less and focus on quality. Each year the team has worked to lower the number of impressions and fulfilled requests. The facility is FSC Certified (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), which is an important component of our Sustainability goals.

#### Departmental Wins

1. Elimination of PMS911 fluorescent ink from corporate style guide
2. 100% of ink purchases are soy or vegetable based
3. 97% of paper stock is FSC Certified
4. Average recycled content across all paper inventory is 77%
5. Paper consumption down 43.7%

#### Challenges

1. Business growth has prompted an increase in Bloomberg Ink activity
  - a. Paper consumption up 11.6% in 2010
  - b. Year to date shipments up 17.1% in 2010
2. Providing incentives to business units to reduce production

#### Future Initiatives

Bloomberg Ink will continue to monitor and analyze the number of jobs performed and quantity of materials shipped from the Ridge Road facility. It is expected that Bloomberg's Ink 2011 footprint and number of jobs will increase due to the expected increase in external advertising for current and future terminal users. The material impact of this increase on our Carbon Footprint should be relatively minimal, given the percentage Bloomberg Ink represents to overall numbers. For continued reduction of Carbon Footprint, Ink & the Sustainability Group will have to educate end users on the environmental impact of printing and identify alternative means of distribution of branding, sales and corporate literature. Bloomberg Ink, along with the Sustainability Team will evaluate transitioning the delivery van that runs from Ridge Road to Skillman, NJ into a bio-diesel vehicle, potentially using the used oil from the fryers at our cafeteria

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Broadcast 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	(39.8%)
2010 \$ Spend/(Savings)	(\$59,200)

#### Department Overview

The Broadcast Group creates TV and radio programming around the world, primarily from two main hubs; New York and London. The majority of power is consumed in the hub rooms, control rooms and studio lighting and screens in major locations. Broadcast also operates tier II sites in offices and stock exchanges around the globe. These positions range from larger multi-camera studios to single “stand up” reporter camera positions installed within Bloomberg newsrooms and stock exchanges. The power used at these locations is very small as the equipment is only turned on when in use. The continued decrease in carbon footprint is mainly attributable to consolidation related to Bloomberg LP Multimedia strategy.

#### Departmental Wins

1. Power monitoring installed for London studio to provide real time power consumption data
2. Low powered lighting installed in new studio at 731 Lexington Ave. Estimated saving of 500,000 kWh compared to standard bulbs
3. Continue to follow power off policy during off hours

#### Challenges

1. Continuous power monitoring not installed in NY & DC studios
2. Low hanging fruit available by shutting down lighting and video walls when not in use already attained.
3. Shutting down other equipment will be more challenging and may not be possible in many cases.

#### Future Initiatives

Continue to investigate new technologies to find products that serve our business needs and lower power consumption. Continue to request power consumption information from vendors and utilize data in procurement decisions. Reorganization in Broadcast will continue to present an opportunity to further slash carbon footprint. New Broadcast areas will have estimated lighting reductions of 60% - 80% from use of LED compared to current lighting. Also, moving to open studios plans will drastically reduce cooling requirements. Better power monitoring equipment to be installed in DC and NY studios.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### BLP Carbon Emissions 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	(21.54%)
2010 \$ Spend/(Savings)	\$1,588,992

#### Department Overview

Since 2007, Bloomberg has engaged in the calculation of its company-wide Carbon Emissions with documented guidance from the WRI and WBCSD, as well as information available on The Greenhouse Gas Protocol Initiative website ([www.ghgprotocol.org](http://www.ghgprotocol.org)). BLP's Carbon Emissions are segmented into Scope I (direct consumption/combustion of fuel/natural gas), Scope II (purchased electricity, steam) and Scope III (other indirect emissions – travel, product shipments, waste, etc.) emissions. We have also segmented our Emissions into operational categories (Facilities, Travel, Supply Chain, Paper Consumption and Waste) and departmental sub-divisions (Networks, R&D, NDIS, Asset Management, etc.). It is imperative for the long-term success of carbon tracking and reduction that the responsibilities and initiatives associated with this effort find "ownership" within the relevant departments.

#### Departmental Wins

1. 2009 Carbon Emissions calculated/Tier-II audit completed, receiving 3rd-party validation.
2. Completed CDP (Carbon Disclosure Project) Survey as a supplier to Bank of America.
3. Completed draft of Bloomberg Sustainability (GRI) Report, including full stakeholder review in conjunction with Ceres. In 1Q2011 updated the report to include 2010 data and will publish final report in April 2011.
4. Registered for UK CRC (Carbon Reduction Commitment) and achieved Carbon Trust Standard Certification for our UK operations.
5. Enhanced communications initiatives, resulting in 36 events attended by 3,600 employees, 1,100 blog subscribers and quarterly campaigns broadly focused on sustainable living.

#### Challenges

1. While the Data Automation project has made headway, we still struggle with resource availability and slow progress. Automation should be complete 1Q2011 and allow us to begin work on other development projects for which the Automation is a prerequisite.
2. Two acquisitions in Dec. 2009 (Businessweek & NEF) had slight impact on 2009 numbers but will have full-year impact on 2010 data. For effective comparison, we have to segment the impact of those acquisitions from our "Core BLP" emissions.

#### Future Initiatives

In early 2011, Sustainability will finally complete the data automation project that has been slowly progressing since late 2009. This will allow us to create the visual reporting (i.e. dashboards) Sustainability has wanted for some time. Coupled with the automation, we will continue to enhance the quality of our data with the intention of embedding the responsibility for the data in the applicable departments at some point in the future.

In addition to all other 2011 initiatives, in 2Q2011 we will publish our first Sustainability (GRI) Report, a significant undertaking which has been multiple-years in the making. The GRI report is currently considered the pinnacle of Sustainability reporting and we expect it will position Bloomberg as a leader in Sustainability and a positive corporate example worth emulating.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Businessweek 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	N/A
2010 \$ Spend/(Savings)	\$369,874

#### Department Overview

Bloomberg acquired Businessweek from McGraw-Hill in December of 2009. Re-branded as Bloomberg Businessweek, the new magazine features expanded content, 20 percent more editorial pages, new sections and a completely retooled and enhanced navigation. The redesign also incorporated the use of FSC certified paper; consistent with our initiative to source paper from environmentally managed forests. The magazine has more than 4.6 million readers in 140 countries. Bloomberg Businessweek has made sustainability one of its key coverage themes by integrating the issue into every aspect of its thinking and reporting.

#### Departmental Wins

1. Bloomberg Businessweek now printed on FSC Certified paper
2. Redesign incorporates increased focus on sustainability related reporting
3. Mobile versions available on Blackberry and iTunes

#### Challenges

1. Aggressive growth of distribution strategy increases carbon footprint
2. Increased weight of redesigned magazine limits ability to reduce emissions associated with production and distribution
3. Have not shifted to paper with recycled content
4. Weekly magazine format provides little opportunity for change in transportation methods

#### Future Initiatives

Bloomberg Businessweek 2011 issues will continue to be produced on FSC Mixed Sources stock and BGREEN will approach the production team to consider a switch to paper that contains recycled content. Both quality and cost of recycled content paper will be considered prior to presenting the formal business case for a switch. BGREEN and Bloomberg Businessweek will begin to track mobile downloads and paperless subscriptions in order to track feasibility of a broader strategy for paperless editions of the magazine. Sustainability will remain one of the key coverage themes for Bloomberg Businessweek editorial.



# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Engineering 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	N/A
2010 \$ Spend/(Savings)	(\$493,359)

#### Department Overview

About 10% of Bloomberg's customer base uses our supplied hardware – B -Units, keyboards and flat-panels. The choice of materials used, where they are manufactured, how much they weigh and how they are repaired and/or disposed of all impacts the environment. Bloomberg must also, of course, consider functionality, reliability, customer service as well as branding and marketing. Engineering is challenged with decreasing the amount of direct energy consumed by, and eliminating hazardous materials within proprietary Bloomberg products while decreasing weight, packaging and shipping density, which in turn lowers freight costs.

#### Departmental Wins

1. Energy Star conversion of 19" Flat Panels
2. Reusable air-filled packaging for shipping customer facing equipment
3. Elimination of Styrofoam for keyboards
4. Packaging reductions for b-units
5. Developed a longer battery-life B-Unit

#### Challenges

1. Unable to find quality solution to chrome end cap replacement
2. Supplier audit not complete
3. Failure to find non-petroleum based packaging for heavier equipment due to drop test failures

#### Future Initiatives

Engineering's principal Sustainability deliverable is to develop sustainable options for our customer facing equipment including but not limited to Energy Star rated electronics, reduction or elimination of harmful materials, increased life expectancy and end of life management. In 2011, the department will work with the Sustainability Team on the next generation Terminal, to ensure that it meets the highest environmental standards possible. Engineering will work to identify a solution to the replacement of chrome end caps for keyboard refurbishments. Additionally, they are looking at ways to reduce the transportation involved with sourcing materials and decrease shipping weight associated with the next generation terminal. Finally, the department is looking at packaging that is sourced from bio-based materials, is biodegradable and uses zero petroleum based products.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Travel (EXPN) 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	20.0%
2010 \$ Spend/(Savings)	(\$2,205,679)

#### Department Overview

The EXPN department is responsible for managing corporate travel via regional travel agencies (3 major onsite travel agencies in New York, London and Hong Kong) and travel vendors, including airlines, hotels, car rental companies and car services, as well as managing Bloomberg's internal expense system. Annually, EXPN will measure supplier performance in relation to service level agreements and propose/negotiate new supplier agreements. On a daily basis, EXPN manages online expense system, global corporate card programs and performs employee expense reviews for compliance. EXPN had a total of 53,868 travel requests in 2010, up 23.4% from 2009 (43,665 requests) and up 29.5% from 2008 (41,596 requests).

#### Departmental Wins

1. 2010 Travel between London/Paris and London/Brussels was ~94% rail; between NY/ Washington, DC was ~58% rail.
2. In the face of 12.9% employee growth from 2009 to 2010, US Car Service followed suit, increasing 11.6%, while UK Car Service was up only slightly (1.8%). Both are still below 2007 levels (11.7% and 53.1% respectively).
3. Preferred Hotels list includes "Green" options in markets where available. Green options will expand as environmentally-friendly hotels become more prevalent in major markets.
4. 2010 Travel data includes traveler information, allowing for more detailed analysis of our travel activity.

#### Challenges

1. BLP Sales policy, reinforced by management, dictates Sales travel will not be reduced, and in slower business cycles we actually travel more, so limited opportunities for reduction.
2. Through acquisition and organic growth, quantity of employees traveling is increasing year-over-year.
3. Concept is ahead of practice in many areas (Green hotels, Hybrid Car availability), so while Green alternatives are identified, consistent utilization of these alternatives remains difficult.

#### Future Initiatives

There is no expectation that overall travel is a candidate for reduction. It has been, and will continue to be, a key component of our business model and is growing in excess of BAU growth. Where EXPN has been successful, with significant help from Sales, is utilizing Rail as a viable alternative to Air on key local routes, and reducing Car Service activity in the UK and US. 2010 results hint that, with upward pressure on all travel activity from company growth in the last year, these initiatives may have reached the limit of their reductions.

Separately, EXPN continues to actively work to implement Green alternatives within the travel profile, specifically Green hotels and Hybrid-vehicle car service. As stated above, concept is ahead of practice in these areas, and availability of both is limited, but the expectation is at some point the proliferation of these options will be such that they will become the default options.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Facilities and Design 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	(25.5%)
2010 \$ Spend/(Savings)	(\$1,132,000)

#### Department Overview

Global Facilities and Design is responsible for designing, building and operating 184 offices, data centers, nodes, and warehouses in 73 countries. The Bloomberg offices communicate the Bloomberg “ethics” of being fast moving, customer service oriented and total transparency. The decrease in footprint is primarily due to continued operating efficiencies, and completion of capital initiatives recommended in 2008 energy audits and subsequent similar projects suggested by Facilities personnel globally.

#### Departmental Wins

1. 9 projects are currently in various stages of the LEED approval process including upper floors of 731 Lexington Ave.
2. Contract signed for 1.7 MW photovoltaic system in Skillman
3. Composting program put into place at Ridge Road office.
4. Further investigation of cogeneration at Ridge Rd.
5. Green operating policies continue to be implemented globally

#### Challenges

1. Garbage Bin removal has met some cultural resistance
2. Data Centers are not controlled by one entity. A few groups have control of power usage, but no groups is ultimately charged with managing overall consumption
3. Many of our offices are leased. Major projects require cooperation from landlords and firm’s ability to commit long term to the space

#### Future Initiatives

Facilities will continue to develop and implement projects that lower our carbon footprint. These projects include completion of the solar project at our Skillman campus and, pending a risk assessment, cogeneration at the Ridge Road data center. Facilities is also investigating working with a 3rd party for a cogeneration power purchase agreement at 731 Lexington Ave. All offices retrofits, relocations, new offices and expansion will continue to be either officially certified LEED or will be built using LEED standards. As composting becomes more widespread Facilities will continue to monitor locations where it becomes feasible to implement composting program.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Global Real Estate 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	N/A
2010 \$ Spend/(Savings)	\$7,800

#### Department Overview

Global Real Estate is responsible for the acquisition, management and disposition of all office, warehouse, data centers and land required for all global corporate real estate needs. This includes compliance with all obligations, including payment of rent and related charges, pursuant to worldwide leases as well as managing the portfolio of all owned assets such as City Gate House and Bloomberg Business Park via asset and property managers for these multi-tenant assets. Global Real Estate is also responsible for construction project management for many of Bloomberg LP's office build-outs. While Global Real Estate does not have a carbon footprint they are a significant contributor to our efforts through their outreach to our landlords and diligence in observing green construction practices.

#### Departmental Wins

1. Green Policies are included in our list of preferred lease terms
2. Devised list of green evaluation criteria to rate sustainability of potential locations
3. Green standards, including, but not limited to LEED, are rigorously evaluated and applied during each phase of project lifecycle, from site selection to project closeout.

#### Challenges

1. Markets that we need to be in might not have necessary supply of green buildings
2. Our small office size in many locations limits cooperation from landlords on green issues.
3. Volume of renewal transactions limits amount of diligence that can be performed in small locations

#### Future Initiatives

Bloomberg recently acquired the Walbrook Square development in central London. This site, along with the recently signed lease at 120 Park Ave in New York, will allow further opportunities for Bloomberg LP to develop "flagship" sustainable offices. Additionally, Global Real Estate will continue to include our green language into our preferred lease terms. While we do not expect they will all be accepted, we anticipate as more companies follow suit these terms will be more commonplace in leases. The rigorous green criteria form developed in 2009 will continue to be utilized to evaluate all major new sites and relocations we enter into to evaluate "green" criteria in the site selection. The project managers in this team will continue to manage their construction projects following LEED criteria. This includes recycling construction waste, managing indoor air quality and validating that proper green materials are utilized on the project.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Information Systems 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	(32.6%)
2010 \$ Spend/(Savings)	(\$1,649,665)

#### Department Overview

Information Systems provides all internal IT infrastructures. This includes personal computers, phones, printer, Blackberries and audio visual equipment. These PCs provide users with access to the Bloomberg Professional Service, office automation tools (e.g. spreadsheets, word processing), programming tools and asset management/financial management applications such as SAP for over 13,000 employees globally. This requires considerable staff, capital, maintenance and other expenses that all have an environmental impact

#### Departmental Wins

1. PC upgrade program brought in 3,600 more efficient HP computers in 2010. PC Manufacturers are continually developing more efficient products
2. Conducted further testing of PC Sleep software and found a suitable product for our environment. Will be installed in 2011.
3. Monitors sleep project continues to resulted in saving of approx 11 million kWh

#### Challenges

1. Solutions cannot be perceived as affecting productivity
2. Need to ensure needs/requirements of internal customers are met.
3. New technologies need to be rigorously tested to ensure they will not be disruptive to the end-user

#### Future Initiatives

Information Systems will continue to source PCs and other equipment that are Energy Star certified. Information Systems will implement software solution to put PCs to sleep when not in use. This solution has the potential to save over 3 million kWh per year. Information Systems will also continue to investigate new technologies, products and procedures that will allow BLP to further reduce our energy consumption. Projects include continued to investigation of thin client computing for our offices. Once our initial network access control is improved they will also explore using laptops for our Sales groups as their primary computer. Laptops use half the power of desktops and many employees at Bloomberg have both a laptop and desktop.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Marketing 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	N/A
2010 \$ Spend/(Savings)	(783,571)

#### Department Overview

Founded in the entrepreneurial spirit of Bloomberg, the Marketing department was created in 2009 to help Bloomberg businesses reach customers and prospects with relevant products and services, differentiate our offerings, drive customer preference and deliver a superior customer experience.

Just as our businesses have expanded to reach a wider range of customers—from the financial elite, to business decisions-makers, to government officials around the world—our role in marketing and building the Bloomberg brand has continued to evolve. We are one Bloomberg, reaching our customers through a variety channels.

In Marketing, our collaborative ethos drives both business and brand value. We team with business and functional leads to provide the fact-based insights to make decisions. In addition, we develop integrated strategies and creative solutions to help businesses achieve monthly, quarterly and yearly objectives. Many deliverables consist of designing and overseeing production of print and promotional materials (premiums/collateral), and planning events.

#### Departmental Wins

1. Continued support of the BGREEN communications & employee engagement strategy
2. Removed PMS 811 from corporate style guide
3. Green Summer Picnics with NYC utilizing bio-diesel to power
4. Coordination of Applause! which recognized employees for outstanding commitment to the BGREEN effort
5. Successful management of Sustainability Product positioning work.
6. Coordination of underlying work for 2010 GRI report support
7. Developed a company-wide global sustainable premium procurement model

#### Challenges

1. 3rd Party Print services have increased 29% over 2009 numbers
2. Data capture of footprint data for premiums has proven to be very difficult. Have explored MACS ticket options with little to no success.
3. The restructure of marketing department also de-centralized the MACS system making it difficult to track and capture some premium info.
4. With new company budget structure, Marketing had less control of promotional items as departments with budget could purchase items without consulting Marketing or BGREEN, that have contradictory sustainability messages.

#### Future Initiatives

Marketing continues to support BGREEN through the creation of internal ad campaigns which utilize traditional Bloomberg communications messages – BN's, I-Panels, e-messages, Arcade, etc. The focus of 2011 BGREEN engagement & internal communications will continue to be quarterly campaigns focused on sustainable living – waste, water, biodiversity and sustainable spending. The goals of these campaigns are to get employee's thinking about their impact on the environment, beyond the office. Marketing is constantly pushing business units to use paperless communication methods and to eliminate 3rd party print requests wherever possible. They are also instrumental in developing our sustainability-related product communication plans. These will grow significantly in coming years and will require support.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Markets Magazine 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	(37.6%)
2010 \$ Spend/(Savings)	(\$705,471)

#### Department Overview

Markets Magazine prints about 391,000 copies of its magazine monthly. Of the total, 84% go to terminal users, 4% go to subscribers, 2% are sold on newsstands and the remainder goes either to Bloomberg offices or to hotels, airlines and business class airport lounges. Our geographic distribution breaks down as follows: 44 percent to North America; 35 percent to Europe, the Middle East and Africa; 19 percent to Asia and 2 percent to Central and South America. In 2010, Markets Magazine printed 4.69 million copies, which represents a 2.3% reduction from 2007 prints.

#### Departmental Wins

1. Markets Magazine is now printed on FSC Mixed Sources stock
2. Using ink that has 7% soy
3. Launched paperless version of Markets Magazine using Zinio
4. 9,000 clients have opted into the digital edition of Magazine which counts toward audited circulation.
5. Environmental & Energy section in each issue
6. Knowledge from FSC certification process was leveraged for Bloomberg Businessweek shift to FSC

#### Challenges

1. Markets Magazine changed from 30% recycled stock to 10% recycled stock when it was redesigned in late 2010.
2. Switch to new print vendors requires new solicitations of footprint data
3. Paper pricing always a risk

#### Future Initiatives

Markets Magazine 2011 issues will continue to be produced on FSC Mixed Sources stock, contain 10% recycled content and utilize 7% soy ink. The BSI is working with the Markets Magazine team and RR Donnelly to measure and monitor the distribution portion of the magazine's footprint and to continue to explore ways to increase recycled content and decrease weight. The team will continue to pare the distribution list and ensure that requests for additional print runs are necessary and monitor rejection mailings with a goal of maintaining the amount of 'return to senders' less than 1%. Markets will continue to utilize paperless technology options for subscribers and push clients in areas where traditional distribution is difficult to switch. Additionally, Markets will launch address correction initiatives to reduce returns incorporating address changes onto the terminal, Markets Magazine will continue to provide coverage on Environmental issues and Green business ventures.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Professional Development 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	N/A
2010 \$ Spend/(Savings)	\$0

#### Department Overview

BGreen principally works with Professional Development through the Leadership, Learning and Development (LL&D) team. The LL&D team addresses internal training needs that span all of our departments and regions. LL&D works with experts from business, marketing and occasionally external vendors to develop content and courseware to meet Bloomberg's business goals. Additional online courseware is being developed to further educate employees on sustainability topics.

#### Departmental Wins

1. Applause! program recognizing employees for work in BGREEN and Philanthropy
2. Recruitment materials were developed sustainably
3. Information provided in recruitment materials focused on our commitment to sustainability
4. Introduction to Sustainability Initiative now included in New Hire orientation
5. Creation of a Wellness taskforce that encourages activity consistent with BGREEN
6. Paperless Payroll options

#### Challenges

1. Balancing quick wins with larger initiatives
2. Helping people view changes as positive rather than as losses (e.g., removal of water bottles) through communication or training
3. Maintaining momentum around employee engagement with sustainability
4. Competition for employee attention relative to other company-wide initiatives

#### Future Initiatives

Professional Development will help BGREEN identify and implement employee benefits and offerings that are sustainable in nature. BGREEN is benchmarking employee programs at other best-in-class companies to make suggestions to management in the future. Additionally, BGREEN, along with the 401k committee, will continue to identify ways in which we can bring sustainable investing options to our employees. We are working with LL&D to incorporate sustainability training for departments with high-environmental impact in department guidelines. Finally, BGREEN, Professional Development and Philanthropy will build upon the success of the Applause! employee recognition program.



# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### Purchasing 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	N/A
2010 \$ Spend/(Savings)	\$0

#### Department Overview

Bloomberg's Global Purchasing Department is responsible for procuring goods and services for the business units throughout the firm. The departments' principal customers are Facilities, R&D, NDIS, Engineering, Asset Management and Human Resources – departments with considerable responsibility over the firm's environmental impact. Purchasing is working with suppliers to assist with the procurement of "Green" goods and services to meet the company's goals and objectives. A Vendor Sustainability Survey, a corresponding scoring system and revised language for RFP's and Master Service Contracts now reflect Bloomberg's commitment to Sustainability.

#### Departmental Wins

1. Implemented new REC purchasing strategy aggregating all purchases into one contract, separate from energy procurement.
2. Conducted second vendor survey
3. Signed contracts for 1.7 Megawatt Solar panel array

#### Challenges

1. Balancing premiums associated with Green and department budgets
2. Better education of end-users on benefits of Green items
3. Difficult to track Green costs/savings
4. Deriving vendor survey results directly impacted from incorporation into RFP/RFIs.
5. Fewer opportunities for Carbon Calculator usage. Already engaging in local country sourcing.

#### Future Initiatives

Going forward in 2011, Purchasing will continue incorporating a carbon metric into its purchasing decisions. The goal is to create a way to evaluate carbon impacts based on the location from which the goods are being purchased from – international or domestic. Purchasing will continue to assist Facilities in conducting RFP's on our REC & Electricity purchases globally. We will continue aggregating our RECs into one annual purchase, to take advantage of our volume and achieve cost savings. Purchasing will help the Sustainability Team conduct additional Life Cycle Analysis' on its proprietary products based on the methodology established from the 2010 WRI Road Test of the Bloomberg Flat panel. Finally, the department is a key stakeholder in the development of a 1.7 Megawatt Solar Array on the Skillman campus and will be instrumental in future efforts targeted for Ridge Road and San Francisco.

# Bloomberg

## SUSTAINABILITY PERFORMANCE BY DEPARTMENT

### R&D 2010

CARBON FOOTPRINT/FINANCIAL IMPLICATIONS	
2010 vs. 2007 Baseline CO <sub>2</sub> e % Increase/(Decrease)	(6.7%)
2010 \$ Spend/(Savings)	\$0

#### Department Overview

Research and Development manages the architecture, servers, storage, middleware in the data centers and networks that distribute the Terminal to our customers. They also select and procure the network infrastructure for our global product distribution. The data centers are the heart of Bloomberg's business; it allows customers to access our product in a fast, secure and reliable environment.

#### Departmental Wins

1. CADE Metrics automated and available by typing the mnemonic {BADE <go>} in the terminal. Data shows wide range of efficiency metrics for the data centers
2. Numbers of servers reporting usage details related to usage now over 80% (previously less than 40%)
3. "Green" meeting held on monthly basis with Facilities to foster open communication on efficient data center operations

#### Challenges

1. Data Centers are not controlled by one entity. A few groups have control of consumption, but no group is ultimately charged with managing overall consumption
2. Energy Star for Servers has not yet been developed for the bigger machines Bloomberg LP typically requires for our operations
3. Bloomberg has extremely high uptime requirements and SLAs with our customers

#### Future Initiatives

Bloomberg is an information company. The amount of data put at our customer's fingertips grows constantly. The future challenge is to contain and manage our energy consumption without compromising our product. This will involve continuing to investigate new, more efficient servers, analyzing how applications are written and working with Facilities to institute changes in the way our data centers are operated.

In 2009, a McKinsey team of data center operation experts assisted Bloomberg LP in developing the methodology to collect our Corporate Average Data Center Efficiency (CADE) score and utilize this data to identify and drive efficiency improvements. In 2010, the data needed to collect CADE was automated and can be accessed on the terminal using the {BADE <go>} mnemonic. In 2011, R&D will work to understand how they can improve the data and set targets for each category.

BLP will also consider participating in studies conducted by EPA, Green Grid and other respected organizations. We are also considering participating in an academic consortium supporting data center research at Binghamton University. These data collection exercises allow benchmarks to be set for the industry and will be vital to forming an industry wide knowledge of best practices on operating in the most efficient manner.

## SUPPLY CHAIN

# The Rainforest Alliance

## BLOOMBERG INK, A DEPARTMENT OF BLOOMBERG L.P.

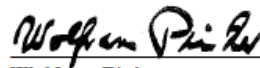
431 Ridge Rd  
Dayton, NJ 08810 USA

IS CERTIFIED FOR FOREST STEWARDSHIP COUNCIL  
CHAIN-OF-CUSTODY

Certificate Registration Code: SW-COC-003563  
Valid from: October 30, 2008 to October 29, 2013

### CERTIFICATE SCOPE:

Single chain-of-custody certificate based on FSC CoC STD-40-004.  
Products and species included in the scope of the certificate are  
found at [fsc-info.org](http://fsc-info.org).



Wolfram Pinker  
Managing Director, SmartWood Program of the Rainforest Alliance  
65 Millet Street, Richmond, Vermont USA 05477

SMARTWOOD IS A PROGRAM OF THE RAINFOREST  
ALLIANCE ACCREDITED BY THE FSC

This certificate is not evidence that a product is FSC-certified;  
additional documentation is required from the certificate holder.

*This certificate is the property of the SmartWood program of the  
Rainforest Alliance. Upon suspension or termination of your  
certification or reissue of your certificate, this certificate must be  
returned to SmartWood.*

ACCREDITED  
FSC-ACC-004  
© 1996 Forest Stewardship Council A.C.





**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, we require all 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.

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.

Service Provider represents, warrants and covenants to Bloomberg and its affiliates that: (i) it has and shall maintain during the Term of this Agreement the proper licenses and rights to perform the Services; (ii) it shall diligently and timely provide the Services in a professional and workmanlike manner in accordance with the highest industry standards; (iii) it is in compliance with all applicable local, city, state, federal and international laws, rules and regulations including, but not limited to, all environmental, safety and health and labor and employment (including those addressing discrimination, harassment and retaliation) laws, rules and regulations, and shall remain in compliance during the Term of this Agreement; (iv) it is not under investigation with respect to, and is not threatened to be charged with and has not been given written notice of, any material violation of any law; (v) its response dated [INSERT DATE ] to the Bloomberg L.P. Vendor Environmental Performance Survey was accurate and complete and continues to be true in all material respects, and that upon request Service Provider shall provide to Bloomberg ongoing reports and data pertaining to environmental or other aspects of the Deliverables which may be used by Bloomberg in its discretion to obtain certifications or achieve standards and in each case maintain them. [NOTE: THIS ASSUMES THAT THE VENDOR SURVEY HAS BEEN PROVIDED TO THE CONTRACTOR]; (vi) it does not discriminate against any employee or applicant for employment because of race, color, religion, sex, national origin, disability or status as a disabled veteran, recently separated veteran, Armed Forces Service medal veteran, other protected veteran or any other legally protected status; (vii) it engages in affirmative action to the extent required by law and is in compliance with Executive Order 11246, the Rehabilitation Act of 1973, the Vietnam Era Veteran's Readjustment Assistance Act of 1974 (VEVRA), the Jobs for Veterans Act of 2003 (JFVA), the Small Business Act, 15 U.S.C. §631 et seq., and their implementing regulations, including, but not limited to, 41 C.F.R. §60-1.1 et seq., 41 C.F.R. §60.741.1 et seq., 41 C.F.R. §60.250.1, et seq., 48 C.F.R. §52.219-1 et seq. and Executive Order 13201 29 CFR Part 470; (viii) it has established adequate safety standards and protocols and that the Personnel shall follow such standards and protocols and be in compliance with the Occupational Safety and Health Administration Act ("OSHA"); (ix) it shall instruct the Personnel in any safety standards and protocols promulgated by Bloomberg, or the management of a facility occupied by Bloomberg, and that the Personnel shall follow such standards and protocols; (x) the Personnel shall have the necessary experience, qualifications, knowledge, competency and skill set necessary to perform the Services pursuant to this Agreement; (xi) the Personnel are approved and authorized to work in the United States under all rules and regulations of the Immigration and Naturalization Service of the United States, if applicable. At any time, Bloomberg may request Service Provider to present copies of Service Provider's programs, policies and/or documentation as to any training provided by Service Provider to the Personnel including, but not limited to, OSHA-related training; (xii) to the extent practicable, it 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; (xiii) it shall use reasonable efforts to avoid employing any persons or using any labor, or using or having any equipment, or permitting any condition to exist which shall or may cause or be conducive to any labor complaints, troubles, disputes or controversies which interfere or are likely to interfere with the operation of Bloomberg under this Agreement; and (xiv) it is not aware, and shall promptly notify Bloomberg if it becomes aware or reasonably foresees, that any labor union will claim jurisdiction over any aspect of the Services performed hereunder, and shall provide Bloomberg with information, as requested, with respect to any such claim.

PROPRIETARY PRODUCT AUDIT

Modeled on the Greenpeace Guide to Greener Electronics				
<b>B-UNITS</b>	Bad	Partially Bad	Partially Good	Good
Precautionary Principle				✓
Chemicals Management			✓	
RoHS Compliance				✓
PVC & BFR Free			✓	
Energy Star Compliance				
Individual Producer Responsibility			✓	
Voluntary Take-Back				✓
Info to Individual Customers				✓
Amounts Recycled			✓	
<b>Keyboards</b>	Bad	Partially Bad	Partially Good	Good
Precautionary Principle				✓
Chemicals Management			✓	
RoHS Compliance				✓
PVC & BFR Free			✓	
Energy Star Compliance				
Individual Producer Responsibility			✓	
Voluntary Take-Back				✓
Info to Individual Customers				✓
Amounts Recycled				✓
<b>Monitors -15"</b>	Bad	Partially Bad	Partially Good	Good
Precautionary Principle				✓
Chemicals Management			✓	
RoHS Compliance				✓
PVC & BFR Free			✓	
Energy Star Compliance		✓		
Individual Producer Responsibility			✓	
Voluntary Take-Back				✓
Info to Individual Customers				✓
Amounts Recycled				✓
<b>Monitors -19"</b>	Bad	Partially Bad	Partially Good	Good
Precautionary Principle				✓
Chemicals Management			✓	
RoHS Compliance				✓
PVC & BFR Free			✓	
Energy Star Compliance		✓		
Individual Producer Responsibility			✓	
Voluntary Take-Back				✓
Info to Individual Customers				✓
Amounts Recycled				✓

## 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

## 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.

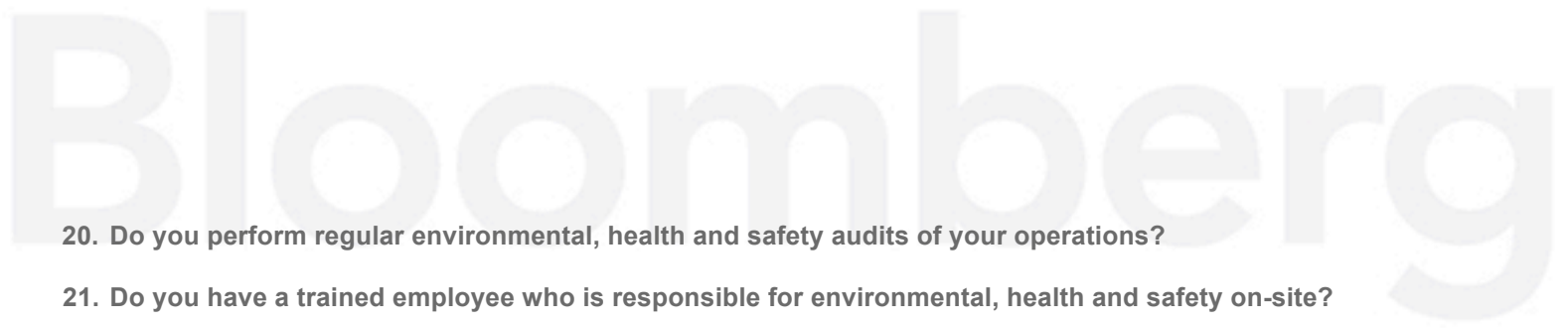
In the event of any violation of this Protocol, suppliers shall immediately ensure the confidentiality and safety of all personnel involved in promptly reporting and correcting any violation of human rights.

Bloomberg's Supplier Protocol of Ethical Behavior 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)

## SCRAPPER/RECYCLER QUESTIONNAIRE

- 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 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?*
- 3. 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.**
- 4. What materials are sent from your facility and where do you send them?**
- 5. Do you send waste materials offsite for disposal in landfills or for incineration?**
- 6. Do you currently have outlets for all of the materials you receive and materials you generate?**
- 7. 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?**
- 8. Do you audit the facilities that receive materials from you?**
- 9. Do you provide documentation or certification of final disposition?**
- 10. Do you generate waste that is regulated, e.g. hazardous waste?**
- 11. Are you subject to environmental, health and safety regulation? If so, please describe.**
- 12. What regulatory agencies have jurisdiction over your facilities and operations?**
- 13. What environmental, health and/or safety permits, licenses, and registrations are required? Do you have them?**
- 14. What agency notifications are required? Have you provided them?**
- 15. Are you in compliance with all applicable regulations and permits?**
- 16. 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?*
- 17. 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?**
- 18. Do you store any products or wastes outdoors?**
- 19. 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?*



- 20. Do you perform regular environmental, health and safety audits of your operations?
- 21. Do you have a trained employee who is responsible for environmental, health and safety on-site?
- 22. Do you provide environmental, health and safety training to your employees?
- 23. Do you have environmental insurance?
- 24. Will you allow verification through an on-site evaluation?
- 25. Please provide references and contact information for other businesses that have used your services.

**EMPLOYEES**

# Bloomberg

## 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.

## 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

Bloomberg is a large organization with fluctuating workforce needs. Please take the time to acquaint yourself with your employee status in your contract, where applicable, and/or as set forth in the supplement specific to your region. If you have questions about your employee status, please contact your manager or Professional Development.

### Flexible Work Arrangements

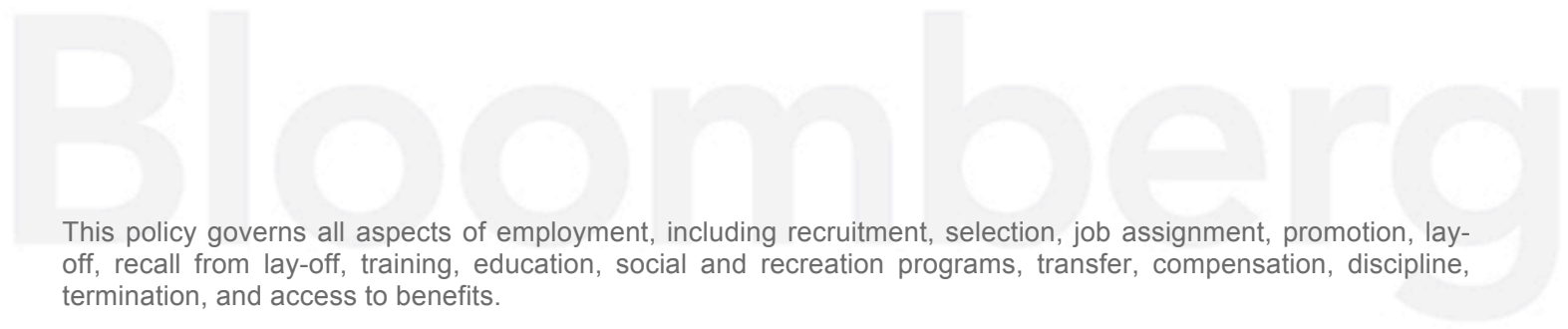
Bloomberg seeks to support our employees' abilities to manage both their work and personal responsibilities. We recognize that throughout an employee's career, a formal flexible working arrangement may be needed, or that on an ad hoc basis, some form of informal flexibility may be necessary. Varying 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 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 reason for the request; 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; 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 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 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

# Bloomberg

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 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 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. 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

Bloomberg

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. 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 further development of employees' careers by providing opportunities to apply for other positions within the Company. Employees may apply for internal positions listed on the Careers at Bloomberg (CAB<GO>) function on the terminal by providing a resume to Professional Development, if they have been employed in their current position for at least one year (or more, based on operating conditions), meet the job requirements of the position, have the permission and positive recommendation of their manager, and have acceptable performance in their current job. Decisions regarding which positions should be posted and employee transfers are in the sole discretion of Bloomberg.

### **Relocation and Transfer**

In order to meet the needs of its business, Bloomberg may request employees to transfer to another Company location. In this situation, the Company will pay approved expenses associated with the relocation/transfer provided the employee remains at the new location for a period of at least two (2) years. In the event the employee leaves the Company within two years of the date of such relocation/transfer, the employee is obligated to pay back 1/24<sup>th</sup> of the relocation expenses paid by Bloomberg for each month remaining in the two-year period. Failure to repay the amount due may result in legal action against the employee.

### **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 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, 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:

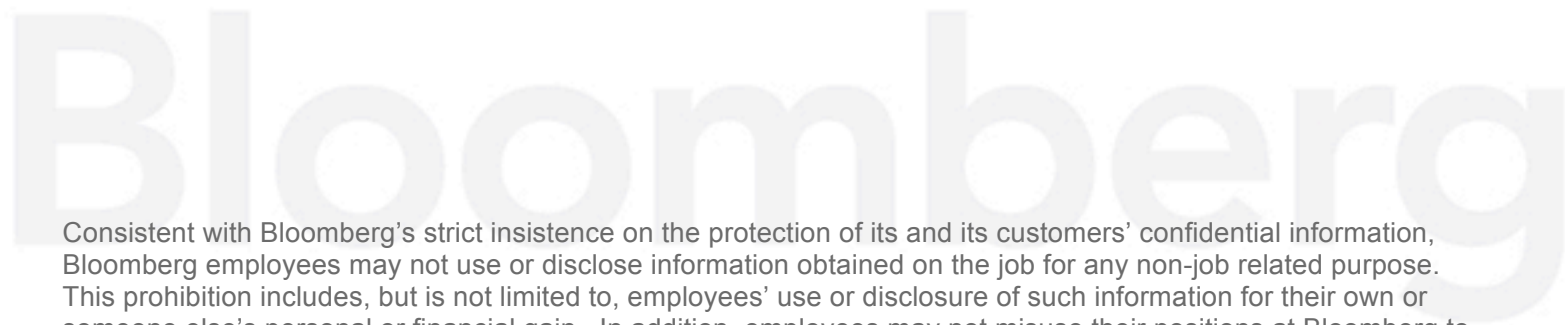
1. Directly or indirectly has a personal or financial interest in any transaction which is, or may be, adverse to Bloomberg; or
2. Engages in, or recommends, a business transaction for Bloomberg that results in personal profit or gain.

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.

# Bloomberg

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 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 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, and any other sensitive personal data, including, but not limited to, EEO information and information concerning a prior criminal record (where applicable), and any other information required by law or requested by Professional Development.

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.

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 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



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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.

Moreover, since it is Bloomberg's policy to only verify former and current employees' position, final salary and dates of employment, all requests for employment references must be referred to Professional Development through entry of a PDSK ticket. 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. 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

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boards and other means of communicating important information, employees may only post notices after receiving authorization from Professional Development.

## **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 conduct 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.

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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.

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.

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.

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## 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.

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- 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 BMAI<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 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.

## **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.



# Bloomberg

**EMPLOYEE CONSENT**

I acknowledge that I have received a copy of Bloomberg L.P.'s Global Resource and Information Core Guide ("Guide"). 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.

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Signature

(Please Print Name)

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Date

Office

## **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, Head of Human Resources or Peter Grauer, Chairman."

# Bloomberg

## DIVERSITY ORGANIZATION AFFILIATIONS

### IN 2010 WE ATTENDED THE FOLLOWING CONVENTIONS AND/OR PROVIDED SPONSORSHIP TO THE FOLLOWING DIVERSE ORGANIZATIONS:

Organization	Resource	Date
National Society of Black Engineers	Convention Attendance and Job Board Use	3/25/09-3/29/09
Dress for Success - NYC	Organization supported by BLP Philanthropy. Leverage their assistance with identifying candidates for support roles.	4/24/2009
National Association of Hispanic Journalists - San Juan, PR	Convention Attendance and Sponsorship	6/24/09-6/27/09
Asian American Journalist Association - Boston, MA	Convention Attendance and Sponsorship	8/12/09-8/15/09
National Association of Black Journalists - Tampa, FL	Convention Attendance and Sponsorship	8/5/09-8/9/09
South Asian Journalist Association - New York, NY	Convention Attendance and Sponsorship	7/10/09-7/11/09
Monster DLP	Leadership conference - undergrad	8/1/09-8/3/09
Grace Hopper Expo - Tucson, AZ	Career Expo	9/30/09-10/3/09
Society of Women Engineers	Convention Attendance and Career Fair	10/15/09-10/17/09

### WE SOURCE EXPERIENCED MINORITY AND WOMEN CANDIDATES FROM THE FOLLOWING ORGANIZATIONS:

85 Broads	A Better Chance	Asian American Journalists Associations (AAJA)
AsianDiversity	Atlanta University Consortium (Clark Atlanta University, Morehouse College & Spellman College)	Careers and the Disabled
Direct Employers Association Network	Dress for Success	Emerging Leaders
Grace Hopper	Harlem Live	Howard University
Inner City Scholarship Fund	InRoads	IRE News Convention
Job Central	Ladders for Leaders	Latinos For Hire
Latpro	Marfan Foundation	Millennium High School
Monster DLP	National Association for the Advancement of Colored People (NAACP)	National Association of Black Journalists (NABJ)
National Association of Hispanic Journalists (NAHJ)	National Association of Native American Journalists Association (NAJA)	National Association of Women MBA
National Lesbian and Gay Journalist Association	National Society for Hispanic Professionals (NSHP)	National Society Hispanic Professional Engineers (NSHPE)
National Society of Black Engineers (NSBE)	New York Times Scholarship Fund	NYC First
Posse	Prep for Prep	Publicolor
Shomex Professional and Diversity Career Expo	Society of Hispanic Professional Engineers	Society of Women Engineers
South Asian Journalists Association (SAJA)	Steamboat Foundation	The Wall Street Business and Disability Group Meeting
UNITY	Veterans	Wesley Brown and Bartle
Women in Corporate America	Women's Media Group	

**WE PARTNER WITH THE FOLLOWING NOT FOR PROFIT ORGANIZATIONS IN RESEARCH AND PHILANTHROPY PROJECTS:**

Catalyst	National Council for Research on Women	Center for Work Life Policy
White House Project	Gay, Lesbian and Straight Education Network	Women's Bond Club
100 Women in Hedge Funds	85 Broads	

**WE WORK WITH THE FOLLOWING CHARITABLE ORGANIZATIONS TO SOURCE INTERNS FROM A VARIETY OF BACKGROUNDS:**

Blind in Business	Reachout	Career Academics
Kids Company	Bangladeshi Football Association	Inner City Scholarship Fund
Body and Soul	Grassmarket Project Brokerage	NY Times Scholarship Fund
Worldwrite	Harlem Children's Zone	Prep for Prep
Ladder for Leaders	Millennium High School	The Door
Phipps	Posse	Washington Center for Politics & Journalism
Steamboat	Year Up	

## 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, and raise awareness of opportunities at Bloomberg. These relationships fall into three categories:

- Attending diversity conferences and providing sponsorship to diversity organizations and cutting edge research projects.
- Working with charitable organizations to source interns from a variety of backgrounds.
- Working with organizations to source experienced candidates from underrepresented groups.

External relationships include:

- Sponsoring the Asian Women's Leadership Summit through the Asia Society.
- Sponsoring the Forte Foundation, a consortium of major corporations and top business schools that help to direct talented women toward leadership roles in business.
- Membership in Diversity in Asia Network (DIAN). In 2010, we attended the DIAN two-day conference in Singapore, and hosted a follow-up seminar at our offices.
- Sponsoring research on women's leadership and women's issues in the financial services industry through the following organizations: Catalyst, National Council for Research on Women, White House Project, 85 Broads, 100 Women in Hedge Funds, Women's Bond Club.
- Sponsoring the Association of Women in Finance in Tokyo.
- Sponsoring IRelaunch, an organization focused on recruiting experienced female professionals who took time out of the workforce.
- Sponsoring Women in Emerging Markets research produced by the Center for Work-Life Policy and the Hidden Brain Drain Task Force, a private sector task force focused on helping corporations leverage their talent across the divides of gender, generation and culture.
- Sponsoring Springboard Media, which offers programs that educate, showcase and support women entrepreneurs as they seek equity capital and grow their companies.
- Targeted recruiting with News associations:
  - National Association of Black Journalists;
  - National Association of Hispanic Journalists;
  - American Asian Journalists Association;
  - South Asian Journalists Association;
  - National Lesbian and Gay Journalists Association.

Internal initiatives include:

- Creating a Working Parents group in Tokyo – a support group of working parents who share information and resources around managing parenthood and work.
- Fostering Maternity Mentoring contacts - a dedicated employee in each business area who serves as a resource and mentor for female employees about to take, and return from, maternity leave.
- Launching Diversity Dialogue sessions, an interactive open forum in which employees discuss how diversity and inclusion directly affect the day-to-day workplace.
- Inserting diversity and inclusion content and messaging into core curriculum, including Interviewing Skills course in New York and London.
- Sponsoring attendance of high-potential women for an external women's leadership program hosted by Women Unlimited.
- Developing B-Discovered Day - a one-day boot camp designed to expose students of diverse backgrounds to entry-level career opportunities in our Research and Development and Analytics departments. B-Discovered allows students to network with Bloomberg professionals and gain more insight into both these roles and a career at Bloomberg. We hired seven out of the 68 attendees and plan to repeat the event annually.

## BGREEN ASSOCIATIONS & MEMBERSHIPS

Logos	ORGANIZATION/MISSION STATEMENT	Transparency/Standards	Supply Chain	Forestry Mngmt	Green Building	Electronics Standards
	<p><b>U.S. Green Building Council</b></p> <p>A non-profit organization committed to a prosperous and sustainable future for our nation through cost-efficient and energy saving green buildings.</p>	●	○	○	●	○
	<p><b>Rainforest Alliance &amp; Forest Stewardship</b></p> <p>Works to conserve biodiversity and ensure sustainable livelihoods by transforming land-use practices, business practices and consumer behavior.</p>	●	●	●	○	○
	<p><b>Global Reporting Initiative</b></p> <p>The Global Reporting Initiative (GRI) has pioneered the development of a framework that organizations can use to measure and report their economic, environmental, and social performance.</p>	●	●	○	○	○
	<p><b>The Green Grid</b></p> <p>A global consortium dedicated to developing and promoting energy efficiency for data centers and business computing ecosystems.</p>	●	○	○	●	●
	<p><b>Basel Action Network</b></p> <p>The worlds only organization focused on confronting the global environmental injustice and economic inefficiency of toxic trade (toxic wastes, products &amp; technologies).</p>	●	●	○	○	●
	<p><b>BSR</b></p> <p>BSR works with its global network of member companies to develop sustainable business strategies and solutions through research, and cross-sector collaboration.</p>	●	●	○	○	●
	<p><b>The Climate Group</b></p> <p>Their goal is to help government and business set the world economy on the path to a low-carbon, prosperous future.</p>	●	●	●	●	●
	<p><b>CERES</b></p> <p>A national network of investors, environmental organizations and other public interest groups working with companies and investors to address sustainability challenges such as climate change.</p>	●	○	○	●	○
	<p><b>World Resources Institute</b></p> <p>An environmental think tank that goes beyond research to find practical ways to protect the earth and improve people's lives.</p>	●	●	●	●	●
	<p><b>UN Global Compact</b></p> <p>A strategic policy initiative for businesses to align their operations and strategies with ten principles in the areas of human rights, labour, environment and anti-corruption.</p>	●	●	●	○	●