

# Bureau van Dijk Modern Slavery Act Statement 2018<sup>1</sup>

Bureau van Dijk recognises that modern slavery and human trafficking is a global problem, and this statement sets out the steps taken in seeking to prevent it taking place in any part of our business or supply chains.

## Our Business

The Bureau van Dijk group operates globally and is part of the Moody's Analytics line of business. Bureau van Dijk supports the credit analysis, investment research, tax risk, transfer pricing, compliance and third party due diligence needs of financial institutions, corporations, professional services firms, and governmental authorities worldwide.

Bureau van Dijk employees have proudly upheld the company's worldwide reputation for high standards of business conduct. An essential aspect of Bureau van Dijk success is our collective commitment to operating in an ethical and lawful manner to maintain the integrity of our business.

## Core Business Efforts

### Moody's Code of Business Conduct

As part of the Moody's Analytics line of business, Bureau van Dijk is bound by a number of codes, policies and procedures to run the business in a fair, ethical and lawful manner and in compliance with applicable laws and regulations. The Moody's Corporation Code of Business Conduct (the "Code") is a statement of the fundamental principles and certain key policies that govern the conduct of our business and can be found on the Moody's website [https://www.moody.com/uploadpage/Mco/Documents/Documents\\_professional\\_conduct.pdf](https://www.moody.com/uploadpage/Mco/Documents/Documents_professional_conduct.pdf). The Code confirms that an essential aspect of Moody's success is our collective commitment to operating in an ethical and lawful manner to maintain the integrity of our business. The Code, which has been approved by the Moody's Corporation Board of Directors, sets forth the guiding principles we expect each employee and corporate director to follow. Every Bureau van Dijk employee receives training on the Code and is periodically required to certify that he or she has reviewed this Code, understands it, and agrees to be bound by its terms. One of the key areas covered by the Code is "How we Act with Integrity in the Global Community".

### Workforce Profile

We have one entity that employ people in the UK, and some foreign branches. The majority of UK employees are employed on full-time contracts. A proportion of our employees are part-time, and their terms and conditions are otherwise the same as for full-time staff. We believe our own employees are at low risk of suffering from modern slavery and human trafficking.

We offer competitive pay, benefits, employment conditions and policies which are periodically benchmarked, and we have flexible working arrangements available to all employees, such as part-time and telecommuting arrangements. We do not operate zero hours contracts. All our employees are subject to the standards in our Code, as set out above.

## Supply Chain Efforts

### Outsourcing and Supply Chain Relationships

Our supply chain mostly consists of reputable financial services firms, sophisticated independent consulting firms, and other service providers, in the areas of finance and technology (including the procurement of software, data and other technology-related goods and services). Bureau van Dijk utilises agency workers and, in doing so, works in compliance with the UK's Agency Worker Regulations and reputable agencies with their own established governance and policies. From time-to-time, we also engage specialist contractor resources for specific projects.

<sup>1</sup> This statement is made on behalf of Bureau van Dijk Electronic Publishing Limited which falls under the scope of section 54(2) of the Modern Slavery Act 2015

Given the nature of our business and the typical goods and services we procure, we consider the risk of slavery and human trafficking in our supply chain to be low. Bureau van Dijk exercises skill and care when selecting third party service providers, including a determination as to whether they have the ability and capacity to perform the contracted function(s) reliably and professionally. When selecting new suppliers, we consider the suitability of the particular product or service for Bureau van Dijk needs, as well as other selection criteria, including organization and management, reputation, and their ability to meet Bureau van Dijk applicable regulatory or legal requirements.

Our arrangements with material suppliers are generally documented by a written agreement specifying the respective rights and obligations of Bureau van Dijk and the supplier. Bureau van Dijk requires its service providers: (i) to comply with all applicable national, local, and international laws; and (ii) not to participate in any illegal, deceptive, misleading or unethical practices. Our standard UK contract templates for Master Professional Services, General Consulting Services, Client Training Services and Master Temporary Staffing Services include a specific provision that requires the supplier to: comply with all applicable anti-slavery and human trafficking laws (including the Modern Slavery Act); implement due diligence procedures for their own supply chains; confirm that there is no slavery or human trafficking in its supply chains; and, notify Bureau van Dijk of any breach. Additionally, our non-UK standard templates for Master Professional Services and General Consulting Services also refer to the UK Modern Slavery Act.

We will not support any supplier relationship where we are aware, or have reasonable grounds to believe, that slavery and human trafficking is taking place, and Bureau van Dijk will take appropriate action if it appears that the supplier is not carrying out its functions as per the contractual arrangements and/or in compliance with the applicable laws and regulatory requirements.

## Feedback and Future Activities

### Training and Capacity Building

In 2018 we are rolling out a further programme of online-based training on Modern Slavery and Human Trafficking to all UK employees.

### Open Door Communication and Whistleblowing

Bureau van Dijk objective is to maintain an environment in which all employees feel comfortable to raise issues that they believe are important. Bureau van Dijk therefore supports open door communication and encourages employees to raise concerns with their immediate supervisors or other senior managers. We also operate an Integrity Hotline for employees to raise issues or report concerns. In accordance with applicable law, no employee will be subject to retaliation because of a good faith report of suspected misconduct.

### Feedback

If you have any comments on this statement or would like to report any matter regarding it, please email [csr@moodys.com](mailto:csr@moodys.com).

A handwritten signature in blue ink, appearing to read 'Drussell', written over a horizontal dotted line.

Daniel Russell

CEO –Bureau van Dijk Electronic Publishing Ltd, September 2018