

Supplier Code of Conduct

Bentley's mission is to leverage our leading software and services to drive impact through the world's infrastructure – advancing both the global economy and the environment for improved quality of life. We are committed to conducting business with integrity and upholding high standards for business ethics and responsibility. This commitment extends to our suppliers, vendors, and other business partners. Through our [Code of Conduct](#), Bentley has defined standards for ethics and compliance. Our Supplier Code of Conduct details our commitments to responsible business throughout our supply chain.

Compliance with the Supplier Code of Conduct

All suppliers and their employees or consultants (suppliers) must adhere to this Supplier Code of Conduct while conducting business with and/or on behalf of Bentley. Suppliers should ensure that the requirements are communicated, understood, and followed by their employees.

To report potential violations of Bentley's Supplier Code of Conduct, please:

- Send a message to our Whistleblower Hotline via a dedicated, externally managed web site available at the URL <https://www.openboard.info/BSY>. Anonymity is assured by the third-party web site service, unless you choose to state your identity.
- Send a letter to the Compliance Committee at the following address: Bentley Systems, Incorporated Compliance Committee 685 Stockton Drive Exton, PA 19341 USA

Bentley may audit compliance with this policy. Violations of this Supplier Code of Conduct may result in termination of your Supplier relationship with Bentley.

Legal & Regulatory Compliance

All Bentley suppliers must comply with all applicable laws and regulations while conducting business with and/or on behalf of Bentley. This includes:

Anti-Bribery: All Bentley suppliers are prohibited from offering or receiving a bribe, kickback, gratuity, or other improper payment or service in order to achieve a desired business result. Suppliers must comply with US FCPA and other relevant anti-corruption laws and regulations.

Antitrust: All Bentley suppliers are prohibited from conduct or behavior aimed at limiting competition. Suppliers must comply with relevant anti-trust laws and regulations.

Insider Trading: All Bentley suppliers are prohibited from insider trading and must comply with relevant laws and regulations.

Trade Controls: All Bentley suppliers must comply with all U.S. and local regulations and other controls that govern the transfer, access, export, re-export of Bentley products, services, and technology.

Data & Privacy Protection

Bentley is committed to ensuring the privacy and security of data. All Bentley suppliers are prohibited from disclosing company or customer information to unauthorized third parties and must adhere strictly

to the business use cases outlined in applicable agreements. Suppliers must adhere to relevant privacy and data laws and regulations. If there is any doubt at all as to what can and cannot be provided, suppliers should contact Bentley's Data Protection Officer at DPO@bentley.com.

Intellectual Property

All Bentley suppliers must respect and protect Bentley's intellectual property rights, including copyrights, patents, trademarks, and trade secrets. Suppliers must comply with relevant intellectual property laws and regulations.

Human Rights

Bentley is committed to defending the rights of all workers and supporting international frameworks, such as the UN Declaration on Human Rights. All Bentley suppliers must follow all applicable local laws, regulations, and standards concerning working hours and conditions for all workers. Suppliers must not use or permit forced labor, human trafficking, child labor, or other infringements on fundamental human rights. For additional details about our commitment to human rights, please reference [Bentley's Statement Against Modern Slavery and Human Trafficking](#).

Non-Discrimination, Diversity and Inclusion

Bentley supports workplace fair practices that promote diversity and inclusion. All Bentley suppliers are expected to promote a workforce and workplace free of harassment, unlawful discrimination, and retaliation. Suppliers are expected to provide equal opportunity employment and must not discriminate on the basis of age, race, color, sex, religion, national origin, sexual orientation, disability, covered veteran status, or any other status protected by law.

Safety

Bentley is committed to maintaining a safe working environment. All Bentley suppliers must comply with applicable occupational health and safety laws and regulations. Suppliers must maintain a healthy and safe work environment, free of violence and intimidation.

Environmental Responsibility

Bentley's commitments to environmental stewardship are outlined in our [Environmental Policy](#). All Bentley suppliers must adhere to the provisions detailed in our Environmental Policy.