

BENTLEY FIRST
RESPONSE TEAM

GOVERNANCE AND RISK MANAGEMENT

Explore how we put policy to practice



Our robust governance approach serves as the cornerstone of this transformative journey, ensuring effective implementation and accountability at every level of our organisation. This approach is not static, but rather, evolves continuously to remain in lockstep with our unwavering commitment to sustainability, our rich heritage, and our relentless pursuit of innovation.

Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices

SUSTAINABILITY PROGRAMME GOVERNANCE

Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices

Sustainability is very important to us, and the strong governance we have set up reflects that. This governance helps make sure we consider sustainability throughout the business in everything we do. It makes sure we are transparent and accountable when it comes to sustainability topics and reporting. And, with the Board leading from the front by owning sustainability, it makes sure our commitment is clear not just to our colleagues, but to our customers and other stakeholders.

Integrating sustainability governance

Sustainability is central to our Beyond100 strategy, with Sustainable Luxury being one of its key quadrants. To make sure this is integrated throughout our organisation in our everyday work, we use our sustainability governance framework.

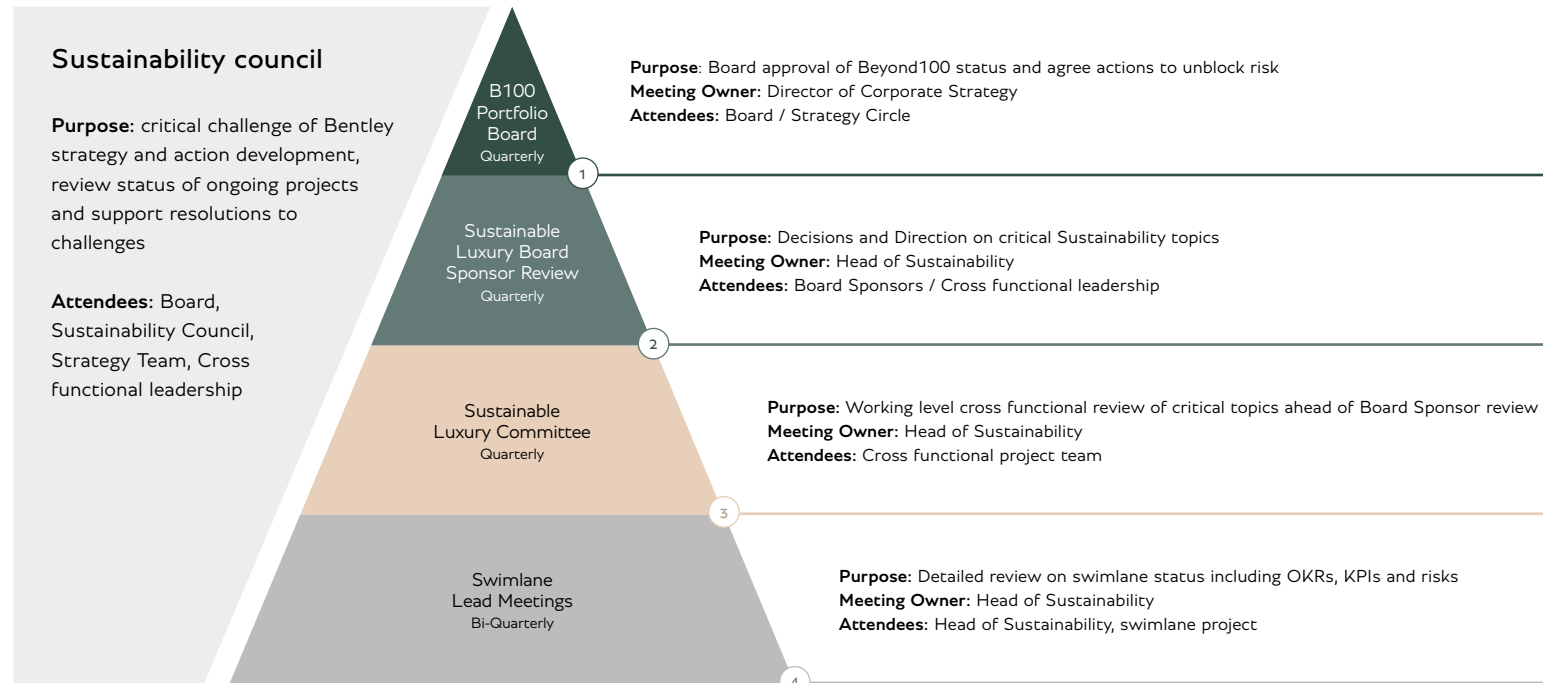
Governance structure

We want our governance to help our colleagues make informed decisions quickly, rather than being a tick-box exercise or a lengthy approval process.

Our governance structure enables us to:

- Clearly and transparently monitor progress across the quadrant and swimlanes. Please see pages 11 and 13.
- Ensure reporting and information sharing is consistent throughout the organisation, both up to the Board and down to projects
- Identify and mitigate risks quickly, before they become problems
- Manage dependencies, change requests and budget
- Make sure roles for accountability and responsibility are well defined

SUSTAINABLE LUXURY GOVERNANCE STRUCTURE



Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices



Sustainable luxury governance key changes since 2022 report

We have a new rationale behind governance:

- Our new Board sponsorship represents the importance of product sustainability to achieve our ambitions
- We hold four sustainability-focussed Board sponsor reviews a year to discuss status, risks and resolutions to achieve ambitions
- Our strategic goal setting framework includes OKRs (Objectives and Key Results), clear KPIs and Risk Management

Sustainable luxury governance meetings

- Beyond100 Portfolio Review – full Board-level review of progress of Beyond100 corporate strategy, including breakthroughs; objectives and KPIs; and key strategic risks requiring support or escalation
- Sustainable Luxury Board Sponsor Review – detailed review of the Sustainable Luxury strategy ahead of the Portfolio review, including overall status of project activity; objectives and KPIs; risks requiring escalation to the Board; and priority topics requiring Board sponsor approval or direction
- Sustainable Luxury Committee – checkpoint meetings before Board reviews to review progress towards objectives; share information on priority sustainability topics and facilitate progress
- Swimlane Lead Meetings – meetings with the project leads to ensure we meet quarterly targets and can understand any topics which require cross-functional support or escalation



The Bentley Board, Sustainable Luxury Committee and Sustainability Council meet twice-yearly.

The nomination and selection processes for the highest governance body and its committees, including the criteria used to nominate and select members, takes into consideration stakeholders' views, diversity, independence and relevant competencies.

Bentley Sustainability Council

The Bentley Sustainability Council (the Council), which was launched in May 2023, reinforces and challenges the effectiveness of our Beyond100 strategy by advising the Board and the Sustainable Luxury Committee. The Council are change agents, responsible for guiding us on the next phase of our journey, evaluating our sustainability performance, and incorporating external perspectives and ideas to help us reach our 2030 goals. The Council critically evaluates our plans and engages the rest of the company in discussions about how to achieve these goals. It also shapes our thinking, strategy and decision-making when it comes to sustainability.

The members of the Council are:

- **Dr Sally Uren**, OBE, Chief Executive, Forum for the Future
- **Dr Andrew Dent**, EVP of Materials Research, Material ConneXion
- **Dr Nicholas Garrett**, Director and Co-Founder, RCS Global Group – An SLR Company

Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices

Key responsibilities:

- Independently challenge our overall sustainability strategy to ensure it is relevant, suitable and future-proofed
- Encourage us to take a cutting-edge, thought leadership approach to sustainability
- Guide us on best practice, trends and medium to long-term issues

The Council's focus areas include decarbonisation, sourcing sustainable materials, establishing a carbon-neutral and transparent supply chain, and implementing a circular economy. They are also helping us to transition to a more just and regenerative approach.

The first Council meeting was held in April 2023, where the team discussed several key topics for Bentley, the automotive industry and the wider businesses community in depth. This included a future-focussed 2030 scenarios session, where the Council, Board and colleagues across multiple functions explored the implications of different future scenarios, the potential impact and actions that Bentley could take. As part of the 2023 Council Meetings, we have also explored circular economy, supply chain transparency and sustainable materials, resulting in many new projects and activities in these areas.

Strengthening governance through communication

Strong governance requires effective communication. Our internal communications team publishes weekly bulletins, collaborating with the Sustainable Luxury Committee to share relevant information. The Communications team also produces quarterly updates on the delivery of the Beyond100 strategy, including the Sustainable Luxury quadrant, to colleagues and stakeholders to keep them informed about results and upcoming priorities.

We hold monthly leadership briefings and workshops for top-level, mid-level and first-line management across all business functions. The briefings update colleagues on progress towards business targets, and the workshops give them the chance to discuss our strategic priorities and their related actions in depth.

Sustainability governance and training

To maintain effective governance and strong performance, we have implemented ongoing processes. These include using our in-house experts' knowledge to develop training to enhance sustainability expertise across the organisation and address knowledge gaps.



To promote sustainability awareness across our workforce, including the Board, we run annual Project1hour focus sessions, covering topics such as the importance of sustainability initiatives for Bentley and actions taken under the Beyond100 strategy. Learn more about Project1hour on page 40.

We also run annual Environmental and Energy Compliance Management System training for relevant colleagues, emphasising our dedication to compliance and environmental responsibility.

Connecting across the Group

Active participation on sustainability within the Group is essential, which is why Bentley is part of working groups and management teams, such as the Group Steering Committee, Sustainability Core Managers Committee, the Decarbonisation Project House and the DK1 Working Group.

Our participation in these forums allows us to learn from our peers, and work together to share knowledge on challenges, such as navigating new sustainability regulations in Europe.

To uphold ethical supply chain practices, we adhere to the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG) as a subsidiary of Group. Learn more about LkSG on page 90. We collaborate with Audi and the Group on the Corporate Sustainability Reporting Directive (CSRD) for improved sustainability reporting.

Our commitment to sustainability, including our work with the Group, reflects the integrity of Bentley.

➔ Find out more in the next section.

RISK MANAGEMENT

Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices

We take risk seriously and are committed to responsibly identifying, assessing, managing and communicating environmental, social and governance risks at all levels of our organisation. Sustainability risks are part of our overall risk management framework.

Our risk management framework

Our risk management framework makes sure we navigate risks appropriately, while upholding our commitments to sustainability and working towards our strategic goals. Our framework aligns with the ISO 14001 and IATF 16949:2016 standards.

We use two systems to identify, assess and control risks: the Risk Management System (RMS) and the Internal Control System (ICS):

- RMS is a quarterly process we use to identify, assess and manage operational risks to our business. Through RMS, our functions evaluate the impact and likelihood of operational risks, allowing us to prioritise them. RMS also includes clear escalation routes for larger or deteriorating risks.
- ICS is a yearly test of our control environment run by a third party. It checks that our business processes are effective and economically efficient.

Risk governance

Reflecting the importance of risk to Bentley, our Board is ultimately responsible for risk management. The Board defines our risk strategy, evaluates our risk tolerance and oversees our risk exposure (including for sustainability). This is managed in the context of the Group-wide risk management framework and procedures.

To do this, the Board is supported by four committees:

- The Joint Health and Safety Committee reviews health and safety risk management
- The Sustainable Luxury Board Sponsors Review determines strategic priorities and monitors projects and commitments linked to the Sustainable Luxury agenda
- The Product Committee reviews cross-functional risks relating to product development
- The Risk Steering Committee manages the RMS and ICS, monitoring operational risks and how we prioritise and mitigate risks

Every quarter, the Risk Steering Committee reviews risks that have been escalated to check that mitigating actions have been taken. It then further escalates significant risks and related mitigating actions to the Bentley Board and on to Audi or the Group as appropriate.

Internal control system

The Internal Control System (ICS) is a Group-wide initiative that actively monitors material process risks across all business functions. It is a standardised control framework integral to our annual monitoring process, ensuring we seamlessly integrate process risk management into our business operations.

ICS takes the form of a thorough annual assessment. We are pleased to report a significant improvement in our ICS score in 2023, which increased to 89 per cent (compared to 69 per cent in 2022). This assessment was conducted by an external audit firm, who rigorously tested 282 out of 508 identified controls.



THE RISK MANAGEMENT SYSTEM (RMS)

Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices

Strategic risks	Internal control system (ICS)	Quarterly risk process
<ul style="list-style-type: none"> • Identification of internal and external risks that may impact Bentley's ability to achieve its objectives. • Recorded in Quarterly Risk Process (RQP) if criteria met. • Quarterly Strategy Forum assesses top RQP risks against corporate strategy landscape. 	<ul style="list-style-type: none"> • Yearly recording of control activities to manage process risks. • Testing of effectiveness of control activities. 	<ul style="list-style-type: none"> • Quarterly recording and reporting of the acute and operational risks and counter measures. • Local risk registers are managed and where appropriate based on risk threshold, the risks may be escalated for inclusion into the quarterly process. • Monitoring of the counter measures.

Sustainability risks

Our primary risks and corresponding mitigating actions are outlined in the table to the right. They are not listed in any order.

These risks are material to our current strategy. Risks are considered material where they are likely to significantly impact our operations. Each risk is monitored by the relevant function owner. There may be other risks that are currently unidentified or immaterial that could become primary risks in the future.

Sustainability Risks	Mitigating actions
<p>Transition challenges: Our customers may not transition to more environmentally sustainable products at the same speed as Bentley.</p>	<p>We continue to highlight the benefits in terms of performance, functionality, and environmental impact, whilst working with partners to ensure appropriate and sustainable public and private charging options will be in place.</p>
<p>Slow infrastructure development: The development of infrastructure to support electric vehicles is slow, which may affect customer demand.</p>	<p>We are liaising with industry bodies to promote investment in infrastructure from both the private and public sectors.</p>
<p>Lack of supplier alignment: Our suppliers' plans to transition from combustion engines to battery electric vehicles may be behind ours, which may lead to shortages or higher costs.</p>	<p>We will work with the Group supply chain to make sure they are developing the right parts for our future fleet.</p>
<p>Poor material availability: Recycled materials meeting our specifications may not be available in sufficient volumes through our supply chain, slowing production or restricting use.</p>	<p>We will evaluate sources of materials and processes to help us develop a circular economy. We will also secure key materials through the Group's supply chain.</p>
<p>Environmental impact: Extreme weather events and environmental changes could disrupt our production or affect our supply chain.</p>	<p>We will design our operating environment to cope with more volatile weather, including extreme heat and rain.</p>
<p>Regulatory changes: Changes or divergence in environmental legislation and standards at the regional or country level may result in complex requirements, affecting our ability to support demand in specific markets.</p>	<p>We will develop structures to monitor changes in regulatory environments within our key markets. By identifying changes early, we can respond promptly and challenge regulators where divergence occurs between regions.</p>

GOVERNANCE, COMPLIANCE AND INTEGRITY

Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices

Encouraging a mindset of integrity

We firmly believe that to become leaders in sustainable luxury mobility, we must work from a solid foundation of governance and integrity. Integrity is one of our core values and plays a pivotal role in stakeholder trust, which, in turn, paves the way for long-term economic success. That is why it is embedded in our people processes and interactions with business partners and customers, aligning with our internal values of honesty and transparency.

The Bentley Compliance Management System

Our Compliance Management System (CMS) is built on the foundations of the Group CMS.

Our CMS covers seven areas:

- Compliance and Integrity Culture
- Compliance Objectives
- Compliance Risks
- Compliance Programmes and Processes
- Compliance Organisation
- Compliance and Integrity Training and Communication
- Compliance Monitoring and Improvement

The CMS helps make sure we establish and uphold codes of conduct, policies, processes, training, communication, monitoring, improvement and risk measures for various compliance topics, including:

- Compliance and Integrity
- Prevention of Money Laundering
- Anti-Corruption
- Business Partner Due Diligence
- Business Human Rights
- Whistleblower System
- Code of Conduct

Additionally, we comply with Group-wide policies including antitrust and insider dealing, we adhere to the German Supply Chain Due Diligence Act and we have integrated Business Human Rights into our compliance strategy.

Together4Integrity

Our annual Internal Compliance Risk Assessment and the group-wide integrity and compliance programme come together as Together4Integrity (T4I), which we recently integrated into the CMS.

In 2023, we made substantial progress to embed integrity into our business operations. During 2023, integrity and compliance was included in our routine compliance review cycle, establishing more effective oversight of our integrity and compliance processes. This helped us update several of our compliance training modules, as well as integrate T4I into the CMS.

Protecting our business

We try to proactively prevent regulatory violations by increasing colleague awareness of the risks. The CMS both identifies risks (e.g. corruption and human rights violations) and implements controls to prevent them (e.g. comprehensive training and due diligence on business partners). Our policies then provide a supportive framework to manage the risks effectively.

Our online training modules help colleagues to understand our compliance processes and policies, and how they can flag concerns. Process and control owners undergo more tailored training on the specific risks they are likely to encounter.

Our Anti-Corruption Policy applies to all colleagues, who must disclose potential conflicts of interest. If we identify a potential or actual conflict, we proactively collaborate with them to comprehensively mitigate any associated risks.

Governance and decision-making

When making decisions, we are guided by our values and ethical principles, our integrity and compliance principles and what is best for our stakeholders. This commitment goes beyond legal compliance to consider customer safety, innovation, supplier compliance and social cohesion.

Our governance processes are managed through key committees, including the monthly Compliance Committee. To prevent harm, the committee reviews behaviour against the Code of Conduct and Bentley policy, incorporating relevant audit findings.

The CMS keeps the Board updated on integrity and compliance metrics, including colleague sanctions, compliance training completion and Whistleblower System reports.

We collaborate within the Group via regular Compliance Officer meetings and the Governance, Risk and Compliance (GRC) conference to strengthen our governance approach. This makes sure we address issues collaboratively and get support from other parts of the Group if needed.

Our codes of conduct

The Bentley Code of Conduct outlines the ethical principles and behaviours we expect from our colleagues. It is supplemented by internal guidelines and provisions in employment contracts. The Code of Conduct guidance for daily business activities is binding, and compliance with national and international statutory provisions is also mandatory.

Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices



At the end of 2023, we updated the Code of Conduct, adding a section on ethical leadership and enhancing the areas of human rights, business partnerships, data protection, dealing with Public Officials and our 'Speak-up Culture'. This was launched in January 2024.

Our Speak-up Culture is about encouraging all colleagues to speak up and raise concerns promptly.

Our business partners must adopt our Code of Conduct for Business Partners, which requires them to operate with integrity and to prevent human rights violations. We monitor our partners to capture risks in real time, and identify, manage and prevent corrupt practices (where possible).

We provide regular mandatory training for both colleagues and key business partners on the Codes of Conduct.

Whistleblowing

We take statutory regulations and internal rules seriously. The best way to avoid damaging our company, colleagues or business partners is to respect, maintain and abide by these rules and standards. We believe in identifying misconduct quickly, processing it efficiently and rectifying it immediately.

To do this, colleagues must feel comfortable speaking up about potential serious regulatory violations if they have reasonable suspicions. Colleagues, business partners, customers or third parties can report these at any time and in any language through different channels, enabling our Speak-up Culture.

Reports go to our Whistleblower System, which is managed by Audi. Anyone can also use a separate, independent ombudsman reporting channel to raise concerns.

We will only initiate an investigation of whistleblowing after carefully examining the facts and if we have a reasonable suspicion of a regulatory violation. We review all information fairly, promptly, sensitively and strictly confidentially, and therefore, the Whistleblower System is pivotal to our Speak-up Culture. If we substantiate a serious regulatory violation, we always conduct a structured root cause analysis.

Grievance mechanisms

We also use the Whistleblower System to address the continued risk of modern slavery, environmental and other business human rights violations. This covers anyone working for or on behalf of Bentley in any capacity, including all contractors, agency workers, third-party representatives and any other person associated with the company, wherever they are located.

All employees, suppliers, retailers and authorised repairers have access to an ombudsman service and can make reports anonymously should they wish. They can also raise grievances via a dedicated email address.

Data protection

Upholding GDPR principles is part of our commitment to data privacy. We recognise that we must handle personal data lawfully and ethically, and have a responsibility to safeguard colleagues', customers' and stakeholders' data, while respecting their legal rights.

Our data protection policies define principles, values and standards that make sure we comply with GDPR and other privacy legislation. We use a supporting Data Protection Framework to manage our data (see page 88).

DATA PROTECTION FRAMEWORK (DPF)

Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

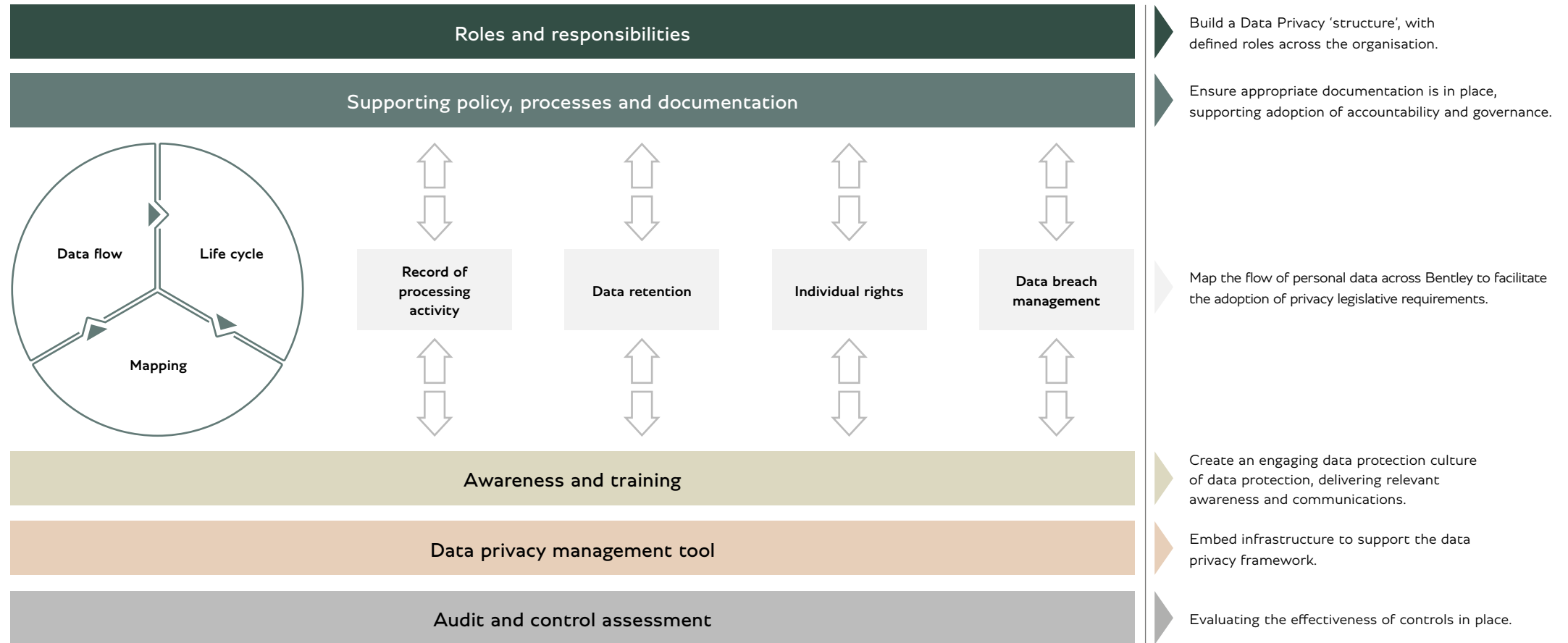
05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices



To make sure we always manage personal data responsibly, specific roles throughout our organisation support data protection using the DPF. It is also integrated into our Beyond100 strategy. On top of this, our policies outline the responsibilities Bentley as an organisation and our employees have concerning personal data. In line with these policies, we have implemented procedures to uphold individual rights and manage data breaches effectively.

In 2023, we invested in a privacy management platform to improve our data protection processes and enhance data governance.

To embed the concept of data protection as an enabler of our Beyond100 strategy, we have introduced a Data Protection Target Operating Model (see page 89), which sets out the fundamental building blocks of a positive data protection culture, and how it links to our organisational strategy.

DATA PROTECTION TARGET OPERATING MODEL

Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

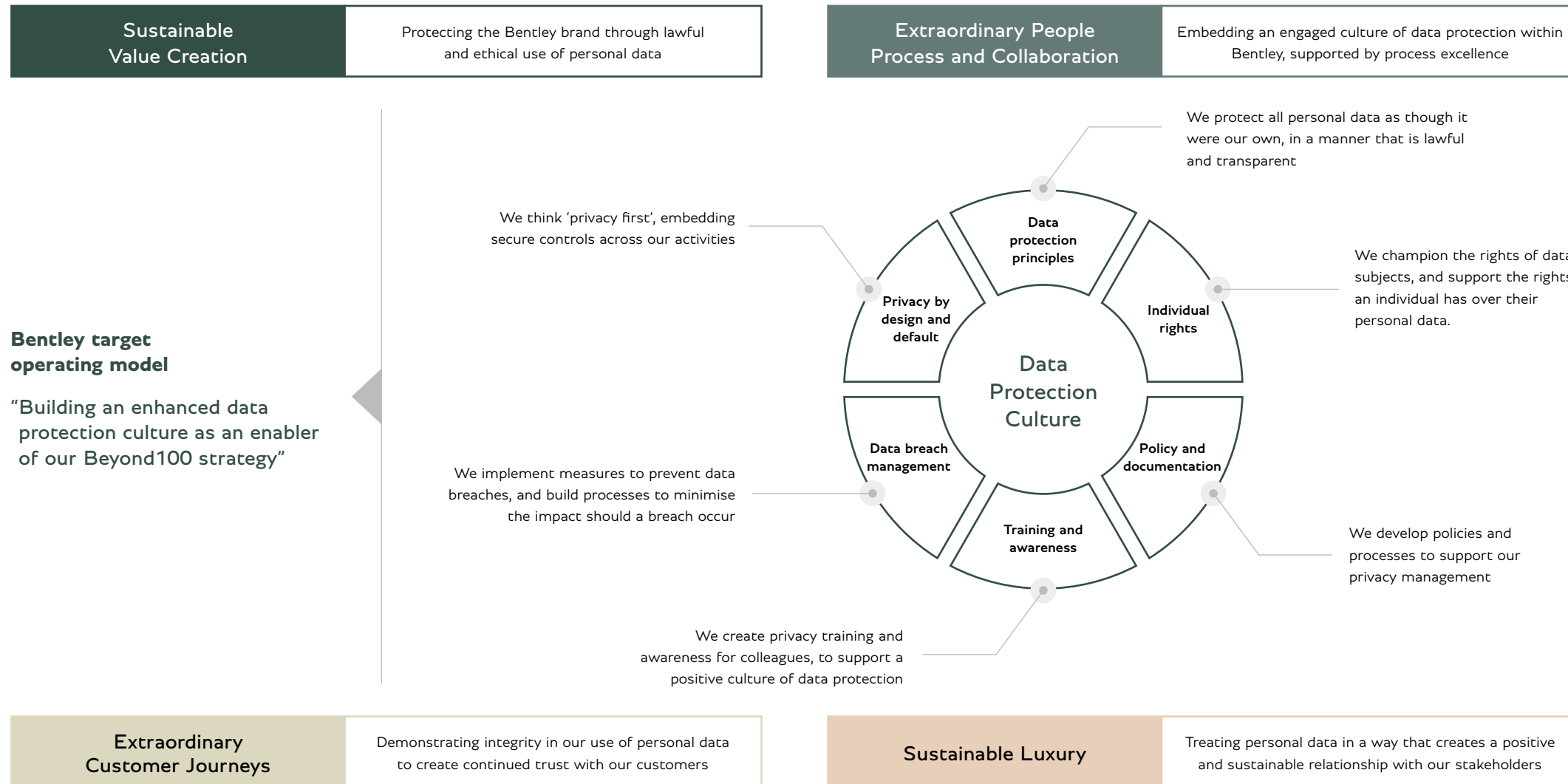
05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices



Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices

Data privacy training

We have fostered a positive data protection culture among our employees by developing tailored training programmes to help them understand data protection comprehensively. This culture, centred on handling personal information with integrity, is instrumental in promoting the sustainable use of data to achieve our Beyond100 objectives, while maintaining the trust of both colleagues and customers.

Colleagues undergo comprehensive GDPR and Cyber Security training to equip them for our digital business environment. Tailored GDPR training helps colleagues understand the core principles of data protection and is mandatory for all colleagues. All new colleagues must complete this training in their first 90 days at Bentley and then an update of this training annually.

Colleagues in office-based roles complete an online e-learning module, while colleagues in Manufacturing have face-to-face briefings.

Our human rights commitments and governance

Our commitment to upholding human rights is reflected in all our production activities and supply chain. It is set out in our Code of Conduct, which is based on the [OECD Guidelines for Multinational Enterprises](#), the [United Nations Guiding Principles on Business and Human Rights](#) and the relevant conventions of the [International Labour Organisation](#). The UN Global Compact's Ten Principles serve as guiding pillars to make sure we respect human rights and protect the environment within our supply chain.

For human rights in the supply chain specifically, our Code of Conduct for Business Partners defines our sustainability expectations for suppliers, retailers and authorised repairers, and addresses topics like modern slavery, human trafficking, child labour and discrimination.

Modern slavery

In 2015, in response to the Modern Slavery Act in the UK, we implemented a Bentley-specific operating policy and established a Modern Slavery Committee. The Committee evolved in 2023 to incorporate LkSG and is now called the Business Human Rights Steering Committee, which meets quarterly. The committee meets quarterly to address and discuss issues related to human rights.

The committee ensures that we fulfil our legislative reporting requirements for modern slavery every year. It also oversees the development of guidance and training to support stakeholder awareness, providing assurance, and escalates significant risks as they arise. The committee also represents Bentley at the Group level.

You can read our [Modern Slavery Statement](#) on our website.

German supply chain due diligence act

The German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG) came into force on 1st January 2023 as part of the German federal government's commitment to safeguard and enhance human rights and environmental standards within the supply chains of companies operating in Germany.

As Bentley Motors is a subsidiary of Group and has a control agreement in place with Audi AG, Bentley supports Group and Audi to comply with their obligations by expanding the Human Rights Steering Committee's scope and membership, focussing particularly on human rights.

LkSG is not a UK regulation, it's important to highlight that the standards we uphold go beyond the minimum requirements.

Supplier risk assessments – S-Rating and Drive Sustainability

We proactively conduct supplier risk assessments using the S-Rating, a ranking system used to verify a supplier's sustainability performance and that its working environment is safe and healthy. The S-Rating is based on suppliers' responses to a self-assessment questionnaire (SAQ).

We assess all production suppliers using the S-Rating. There is more information about the S-Rating process on page 66 - 67.

As part of the Group, we are members of Drive Sustainability, an industry initiative to improve the social, ethical and environmental performance of automotive supply chains.

We ask all of our production suppliers to complete the [Drive Sustainability SAQ](#), which is then used to determine 80 per cent of the aforementioned S-Rating score. The SAQ evaluates their social and environmental practices and includes a large number of questions on topics such as human rights policy, governance, grievance mechanisms, due diligence systems to manage human rights and

working conditions issues, human rights training and responsible sourcing.

Supplier risk assessments – raw materials

To assess the risk beyond our first-tier suppliers, we use 'hotspotting' techniques, identifying potential issues such as the cobalt in the batteries in our supply chain. There is more about hotspotting on page 66.

The Group follows the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas guidelines](#) and has implemented a robust raw material due diligence system since 2020. Covering 16 high-risk materials, the system ensures we source raw materials ethically and sustainably, emphasising our commitment to responsible business practices and making the automotive industry more sustainable.

Supplier monitoring

As well as risk assessing human rights in our supply chain, we also audit first-tier suppliers if their SAQ responses are not satisfactory. We arrange for an independent sustainability assessor to visit the supplier and perform an on-site check.

The expert team responsible for the supplier's region, reviews the audit report and, if necessary, puts in place a corrective action plan to address shortcomings.

Contents

Message from our board member for finance

01 Our business

02 Strategy

03 From power to purpose

04 Leading the way

05 Quality in motion

06 From cars to communities

07 Governance and risk management

08 About this Report

09 Appendices

If we have concerns about second or third-tier suppliers, we investigate the case with the first-tier supplier with the closest relationship to Bentley.

Supplier monitoring – Leather Working Group (LWG)

We audit our leather supply chains as part of our membership of the [Leather Working Group](#), who aim to improve sustainability with responsible leather manufacturing, audited against stringent benchmarks. LWG is the standard owner of a global leather manufacturer audit standard. The LWG Leather Manufacturer Audit (P7) has a section on social audits and certifications.

We only work with leather manufacturers who have been independently monitored against the LWG’s benchmarks and standards and have been certified as gold rated.

↻ For more information on the LWG see page 24

Human rights violations

In 2023, we investigated allegations of human rights violations, and following investigation, these were unsubstantiated. However we remain vigilant in monitoring operations and suppliers.



ENVIRONMENTAL COMPLIANCE

Policies to protect the environment

Our [Environmental Policy](#) provides the framework that governs everything we do, ensuring that we not only comply with our environmental obligations and make the right commitments, but also take the actions needed to achieve them.

Part of that is making sure our colleagues have the right tools and skills for environmental compliance. We provide basic environmental training which makes them aware of the policy and targets, as well as more advanced training on the operational impacts.

Our Environmental Mission Statement defines our direction of travel, targets and objectives. Published both internally and externally, it focuses on climate change, resources and environmental compliance.

Our production site and aftersales warehouse in Crewe are environmentally compliant to the ISO 14001 and 50001 standards (see page 7). We also hold several emissions permits, which are legal compliance requirements.

