

# GOVERNANCE AND INTEGRITY

## Corporate Governance

**Our governance structure and approach ensure that we meet our goal to be leading in sustainability, by integrating the consideration of sustainability at every stage of our work.**

In 2024, we updated our corporate governance framework to enhance clarity and accountability, and to align better with our Beyond100+ strategy. Otherwise, our governance structure and approach remain largely unchanged, and you can read more about it and related governance bodies in the Appendix in our [2023 sustainability report](#). We want our governance structure to help our colleagues make informed decisions quickly.

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. We collaborate with the Group via regular Compliance Officer meetings to strengthen our governance approach. This ensures we address issues collaboratively and get support from other parts of the Group if required.

There have been no changes in the year as to the members or function of the Sustainability Council who have been on-hand as an external voice to help guide us through our sustainability journey.

## Integrity

Stakeholder trust is essential to the success of our business and to our goal to be leading in sustainability. We win that trust in part with a strong demonstration of our values through our integrity.

- In 2024, we launched new values and behaviours, which make integrity and ethical leadership foundational to our culture.
- We developed our [Anti-Corruption Policy](#) with improved guidance and documentation requirements for handling the granting or accepting of business partner benefits, as well as a new section on Public Officials.
- We extended our [Code of Conduct](#), to integrate German Supply Chain Due Diligence Act requirements. These included appointing a human rights coordinator, instituting risk management and prevention measures, enhancing accountability and documentation requirements and reporting, and ensuring all employees complete mandatory compliance training to be repeated every three years.

Moving forward our aim is to reinforce integrity further through updating and refining policies, enhancing training available to our colleagues, and rolling out new tools. We also aim to enhance Board accountability and align governance strategy with identified material topics, helping us to embed sustainability as a core component of governance and decision-making.

We are committed to upholding the highest standards of ethical business conduct through a robust Compliance Management System (CMS). Our CMS helps identify and mitigate risks such as corruption and human rights abuses, ensuring compliance with regulatory requirements and corporate governance principles.

Corruption risks are assessed on a case-by-case basis under Bentley's Operating Policies, including Anti-Corruption, Risk Management, Business Partner Due Diligence, and Sponsorships & Donations Policies. This structured approach enables us to proactively manage risks, ensure ethical business practices, and maintain integrity across our operations and value chain.



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