

Conflict Minerals Policy

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. We believe that running our business responsibly includes managing our operations in an ethical way that promotes and protects human rights while mitigating environmental harm.

Bentley is primarily a software company and the vast majority of our products and service offerings are not manufactured hardware. Bentley supports regulations and industry standards for responsible sourcing of conflict minerals, including the U.S. Securities and Exchange Commission's adopted rule pursuant to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act that requires publicly-traded companies to disclose whether the products they manufacture or contract to manufacture contain conflict minerals originated from the specified Covered Countries (the "Conflict Minerals Rule").

Bentley is committed to compliance with the Conflict Minerals Rule and will continue to work with our suppliers to uphold high standards for business ethics and responsibility. We will evaluate information provided by our suppliers and others, and if we determine a risk of violation of this Policy exists, Bentley reserves the right to evaluate the supplier relationship and take any appropriate action including termination.

We will continue to monitor global developments and the emergence of additional requirements or standards related to the sourcing of minerals from the Democratic Republic of the Congo and adjoining counties as well as from other regions.