

Colleague

Connection

Community

Communicate

Cohesive

Cohesive Supplemental Policy Manual

V2.0 January 2024

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Supplemental Policy Manual

Cohesive is a people business and creating a positive working environment is fundamental to ensure that we can all succeed both personally and professionally.

Introduction

This Company Supplemental Policy Manual brings together all the policies of Cohesive in one single document. All policies are consistent with Bentley Systems policies and have additions to suit the specifics of the Cohesive business. The purpose of this document is to provide clarity to colleagues, clients and other stakeholders and for use in tenders. We would like to remind colleagues of all their personal and our collective obligations and standards expected in relation to our actions and behaviours and to actively

communicate with our partners, suppliers and clients. All policies will be reviewed at least annually and updated to reflect regulations, legal and ethical best practices as well as continuous improvement.

About Cohesive

Cohesive is an operating business within Bentley Systems. Cohesive operates across three regions – Americas, EMEA (Europe, Middle East, Africa) and Asia Pacific (excluding China), trading through Bentley and Cohesive entities.

Cohesive is a global digital strategy, systems integration and data analytics business that brings unique insight and diverse skills to help clients overcome complex design, operation, and optimisation challenges for their asset base. Our purpose is to enable intelligent and efficient infrastructure through value-led digital solutions, shaping a sustainable future for our clients’ high-value assets.

Our complementary propositions help optimise every stage of the asset management process through targeted interventions that help maximise asset value and performance. Our highly skilled specialists drive efficiency throughout the project lifecycle, building collaborative behaviours, smarter decision-making and better outcomes. Cohesive connects an ecosystem of technology solutions, industry specialists and academic researchers to drive digital innovation and deploy visionary digital solutions, sharing cutting edge thought-leadership and technology to implement the solutions of the future, today.



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The policies within this document are completely consistent with all Bentley Systems policies but have regional and sector-specific additions. Compliance with all Bentley policies is still mandatory; the following codes, policies, and certifications are published on the Bentley Systems website, available [here](#):

- Code of Conduct
- Modern Slavery Act
- Section 508 of the Rehabilitation Act (IT Accessibility)
- Environmental Policy
- Supplier Code of Conduct
- Tax Policy
- Privacy and Data Protection

In addition, the following policies are accessible to colleagues on the [Inside Bentley](#) intranet and are available to external parties on request:

- Information Security Policy
- Personal Social Media Use Policy
- Political Involvement Policy
- Record Retention Policy



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Health, Safety & Wellbeing Policy

The health, safety, and well-being of our colleagues, contractors and the public is of primary importance to us.

All our colleagues must understand that they are responsible for their own safety and be alert to safety issues or concerns for the people around them. Our Health, Safety and Wellbeing Policy is to ensure we support our colleagues in this by:

- Providing adequate means of identifying, assessing and controlling the health and safety risks arising from our work activities.
- Consulting with our colleagues on matters affecting their health, safety, and wellbeing.
- Work with our colleagues to identify and control impairment-related risks in the workplace.
- Actively supporting the well-being of our colleagues
- Providing and maintaining safe equipment, including all Personal Protection Equipment where needed.
- Ensuring safe handling and use of substances potentially harmful to health.
- Providing information, instruction, and supervision for colleagues.
- Ensuring all colleagues are competent to fulfil the requirements of their role and give them adequate training.
- Ensuring all colleagues are familiar with the requirements of the Provincial Occupational Health and Safety legislation as it relates to their work.
- Preventing accidents and cases of work-related ill health.
- Maintaining safe and healthy working conditions.
- Making the necessary resources available to implement this policy.
- Being fully committed to the planning, regular review, and development of this policy and related management systems.
- Promoting a culture of health, safety, and wellbeing.

The implementation of this Health, Safety and Wellbeing Policy is set out in each region’s set of Health, Safety and Wellbeing Policy Manuals, in compliance with local legislation, and it is the responsibility of the Regional Managing Directors to ensure it is adhered to. It covers all aspects of health, safety and wellbeing, including physical, mental and emotional health.

A copy of the Health, Safety and Wellbeing Policy Manuals are issued to each colleague and are readily available on our company portal.

Signed:



Colin Ellam, Chief Executive Officer, Cohesive



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Quality Policy

Excellence is at the core of Cohesive’s values, and the quality of our work is central to our success and resilience as a business.

Our objective is to satisfy our clients’ requirements and to meet or exceed their expectations every time, whilst ensuring job satisfaction for our colleagues.

This Quality Policy outlines the fundamental principles against which Cohesive operates and which will support our business objectives. This policy forms the basis for our Quality Management System and is binding on all colleagues and subcontractors.

We are committed to ensuring that this policy and the requirements of Local Best Practice and Legislation are understood and implemented by our colleagues safely, in line with legislation, regulations, and codes of practice. The Cohesive Quality Policy is to:

Establish Quality Assurance:

- Apply the principles of our approach to quality management to all our activities.
- Develop, document, and operate processes and objectives which will allow us to provide consistently high-quality products and services. Cohesive will document its products and services within a Service Catalogue throughout 2024.
- Set measurable quality objectives and monitor the quality of work of our colleagues and subcontractors.
- Focus our efforts on ensuring that all clients are completely satisfied with the services we provide to them, seeking feedback to confirm their satisfaction with our work.
- Establish procedures for identifying, reporting, and resolving quality issues.
- Determine the data and information that support the quality policy, including sources, collection, analysis, and reporting.
- Invest in training our colleagues in areas that enhance the quality of our services.
- Ensure all colleagues are involved in the drive for excellence in our business, as we believe that the abilities, knowledge, and experience of our colleagues are our most valuable resource.
- Keep continuous improvement at the heart of our business and share Learning from Experience across the business.

Undertake Quality Control:

- Monitor the performance of our processes and objectives through audits and peer reviews to provide a basis for their improvement.



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- Undertake management peer reviews of work and performance data, including client feedback and audits.

We have established a Quality Management System which complies with regional requirements and provides a framework for measuring and improving our performance. We will maintain a Quality Management System which complies with the requirements of ISO 9001:2015 within the EMEA region; we will seek to expand this accreditation to other regions as appropriate.

Each Regional Managing Director has ultimate responsibility for Quality within their region, however, all colleagues have a responsibility within their own areas of work to ensure that Quality is embedded within the whole company.

Signed:



Colin Ellam, Chief Executive Officer, Cohesive



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Environmental Policy

Cohesive is committed to protecting the environment, including the prevention of pollution, and continually improving and developing our Environmental Management System to enhance the way we go about our business to minimise our environmental footprint and where possible enhance where we have been.

We conduct all activities in an environmentally responsible way, and we actively encourage our clients and subcontractors to do the same. We have identified the most significant environmental impacts of our activities to be carbon emissions from travel and our ability to influence our clients' environmental performance and this policy prioritises these aspects.

All colleagues are made aware of the aims and objectives of our Environmental Management System, which complies with regional requirements. We will maintain an Environment Management System which complies with the requirements of ISO 14001:2015, within the EMEA region currently and will seek to broaden this system to all Cohesive operating regions. All colleagues globally are expected to adhere to its requirements and are encouraged to suggest ways in which these can be improved.

We are committed to delivering a positive environmental impact through five key action areas:

Smarter futures: We manage and promote positive environmentally related behaviours of our colleagues and our contractors; for example, choices over where colleagues work, modes of transport and remote attendance at meetings when appropriate.

We also inspire clients to develop their awareness and understanding of sustainability issues and increase engagement with sustainable business practices including how we deliver our services to them in order to minimise their operational carbon footprint.

Carbon neutrality: With parent company Bentley Systems having taken their first steps towards a net zero commitment, we will build a culture within Cohesive to promote sustainable behaviours within our operations and the services we deliver to our clients. Bentley have validated near-term corporate targets with climate best practice specialists, SBTi, and we will support the implementation of these initiatives in 2024.

Minimal waste: We follow the established waste hierarchy within our premises and offer the building's management team suggestions for improvements when they are identified.

Sustainable procurement: The Cohesive office leaders will consider this Environmental Policy when making purchases and when making procurement recommendations to Bentley to minimise our environmental impact.

Compliance with legal and other obligations: We identify relevant legal and other obligations related to our operations and confirm compliance through regular audits.



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The Cohesive COO/CFO is responsible for reviewing, at least annually as part of the Cohesive budget reviews, and working with the senior leadership team in setting environmental objectives and targets to ensure the proactive and ongoing development of our Environmental Policy and Management System.

Signed:



Colin Ellam, Chief Executive Officer, Cohesive



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Equality and Diversity Policy

Cohesive is committed to providing a working environment in which colleagues are able to realise their full potential and to contribute to its business success irrespective of their gender, race (including colour, nationality, ethnic or national origin), disability, sexual orientation, marital status, employment status, age, religion or belief, rehabilitation of offenders, and trade union membership. This is a key employment value to which all colleagues are expected to give their support.

In order to create conditions in which this environment can be realised, we are committed to identifying and eliminating unlawful discriminatory practices, procedures and attitudes throughout the organisation. We expect colleagues to support this commitment and to assist in its realisation in all possible ways and comply with the Bentley Systems Code of Conduct. Colleagues will undertake equality and diversity training as part of their annual Bentley Systems mandatory compliance training.

All allegations of unlawful discrimination or harassment will be treated seriously. Colleagues should raise concerns and or allegations with their local HR Manager. Colleagues are encouraged to report any suspected violation of the Code of Conduct to the Compliance Committee via the Confidential and Anonymous Concern Hotline.

Each Regional Managing Director is responsible for overseeing and implementing this policy and monitoring and reviewing its operation within their region.

Equality and Diversity practice is constantly developing as social attitudes and legislation change. We will keep this policy under review and will implement changes where these could improve equality of opportunity.

Signed:



Colin Ellam, Chief Executive Officer, Cohesive



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Ethics, Anti-Bribery, Counter-Fraud, and Insider Trading Policy

One of Cohesive’s core values is integrity and central to living this value is to uphold responsible and fair business practices. We are committed to promoting and maintaining the highest level of ethical standards in relation to all our business activities. Our reputation for maintaining lawful business practices is of paramount importance, and this Policy is designed to preserve our values.

In keeping with our core values and to maintain excellent client and partner relationships, colleagues must comply with the Bentley Systems Code of Conduct and local Colleague Handbooks, and it is our policy that we:

- Operate with inherent transparency in all our operations.
- Hold early open discussions to address any issues that give any cause for ethical concern and take professional advice if we are unsure.
- Declare any conflicts of interest or, if any doubt exists, potential conflicts of interest as soon as they are identified.

We have a zero-tolerance policy towards bribery, fraud, corruption, and insider trading and are committed to acting fairly and with integrity in all of our business dealings and relationships and implementing and enforcing effective systems to counter bribery and fraud.

This policy applies to all permanent and temporary colleagues (including any of our intermediaries, subsidiaries, or associated companies). This Policy also applies to any individual or corporate entity associated with Cohesive or who performs functions in relation to, or for and on behalf of Cohesive including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded colleagues, agents, suppliers and sponsors (“associated persons”).

To meet our goals, we will:

- Require all colleagues to complete mandatory annual compliance training.
- Comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business.
- Act honestly, responsibly and with integrity.
- Safeguard and uphold Cohesive’s core values by operating in an ethical, professional and lawful manner at all times.
- Prohibit all forms of child labour.

Cohesive’s rules and procedures developed to counter fraud and bribery are detailed in the Bentley Systems Code of Conduct.

The Regional Managing Directors are responsible for overseeing and implementing this policy. This policy will be reviewed annually to ensure that it is effective, consistently implemented and continually improved.

Signed:



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Colin Ellam, Chief Executive Officer, Cohesive

Statement Against Modern Slavery and Human Trafficking

Cohesive will operate in accordance with Bentley Systems Statement Against Modern Slavery and Human Trafficking.

Pursuant to provision 54 of the U.K. Modern Slavery Act of 2015 (the "Act"), Bentley Systems, Incorporated and its subsidiaries ("Bentley"), is issuing this Statement for our financial year of 2023 that discloses the steps we have implemented to ensure that modern slavery or human trafficking is not taking place within our organization or within our business supply chains.

Bentley is committed to good corporate citizenship and the highest ethical standards. Bentley is a global leader with a mission to provide innovative software and services for professionals who design, build, and operate the world's infrastructure--sustaining the global economy and environment for improved quality of life. Due to the technical and professional nature of our business, we believe there is a low risk of Bentley engaging in modern slavery or human trafficking. Moreover, we are not aware of any situation that would be considered an instance of a labour violation. We are aware of the complex nature of identifying modern human slavery and will conduct additional diligence to ensure the requirements of the Act are upheld.

Bentley conducts business in countries that may be more vulnerable to human rights abuses than others. Accordingly, Bentley has a zero-tolerance policy for such abuses. Bentley has developed processes to communicate this zero-tolerance policy. This Statement provides a framework for the actions we are taking in order to uphold the obligations outlined in the Act.

Bentley's Code of Conduct and Employee Handbook are Bentley's guideposts for conducting our business with the highest level of ethics and integrity and in compliance with applicable laws and regulations.

This Statement is to affirm Bentley's position that our colleagues, contractors, vendors, suppliers, and other partners with whom Bentley conducts business must not engage in any business practice that would constitute trafficking in persons or slavery. We are committed to our zero-tolerance policy for human trafficking and slavery in our supply chain. Bentley has provided affected departments with compliance training and has communicated this Statement to our vendor community.

Any actual or suspected violation should be reported immediately to Bentley's Compliance Committee.

We will update this Statement as necessary as we continue to improve our compliance program.

David Shaman, Chief Legal Officer and Secretary, Bentley Systems, Incorporated

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Communications Policy

This Communications Policy aims to ensure that content which is shared externally using all personal, Bentley or Cohesive channels including: company websites; the press; LinkedIn; "X" (formerly Twitter); and Instagram, is fit for purpose and consistent with Cohesive's brand, policies, and ethics, including guarding against the potential to create market sensitivity or facilitate insider trading. Examples of communications covered by this policy are website blogs, press releases, articles, and papers.

To achieve this objective, it is our policy that:

- Colleagues comply with the Bentley Systems Personal Social Media Policy.
- Colleagues take due care when posting any information relating to Cohesive. Postings should not disclose any information that is confidential or proprietary to the company, Bentley Systems, or to any third party that has disclosed information to Cohesive. They should seek guidance from their Line Manager or, if in doubt, a Regional Managing Director.
- Colleagues shall ensure all content is proofread and approved by their Regional Managing Director, Regional Business Development Director, or their nominated deputy, before it is published. Only official company postings may include the Cohesive logo.
- Social media postings should not be defamatory or derogatory in any way of Cohesive, Bentley, its colleagues or clients. If colleagues comment on any aspect of the company's business, they should clearly identify themselves as a colleague working within Cohesive and include a disclaimer that the views are their own and not those of Cohesive.
- Social media tools are fast-moving and well-suited to tasks such as the live blogging of events and it may not always be possible to find someone to double-check content. Colleagues must satisfy themselves that their posts are fit for purpose and do not have the potential to put colleagues, Cohesive or Bentley Systems in a difficult position.
- Colleagues are legally responsible for their postings and may be liable if postings include confidential or copyrighted information belonging to third parties. All such postings inside and outside of work are prohibited under this policy.
- Colleagues are responsible for maintaining highly secure social media passwords on all devices.

The policy applies to all colleagues (permanent and temporary) and any subcontractors who have access to Cohesive's websites and social media.

The Regional Managing Directors are accountable for ensuring that this policy is understood and adhered to by colleagues. It will be reviewed annually to ensure it is effective and continually improved.

Signed:



Colin Ellam, Chief Executive Officer, Cohesive



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Information Security Policy

This Information Security Policy aims to protect the confidentiality, integrity, and availability of information that Cohesive collects, maintains, transfers or processes.

Cohesive is committed to managing its own information assets, and customer information assets, in accordance with current legislation and best practice in all operating regions and territories. We will expand the scope of our current 27001 certification and transition to the BSI EN ISO 27001:2022 standard.

It is acknowledged that information exists in many forms: it may be printed or written on paper, stored electronically, transmitted by post or using electronic means, shown on media, or spoken in conversation.

Appropriate protection is required for all forms of information to ensure business continuity and to avoid breaches of the law and statutory, regulatory, and contractual obligations.

Our overarching policy is to treat information appropriately and in accordance with the risks associated with it. To achieve this, Cohesive’s Information Security Policy is:

- Provide a robust IT system where data is backed up, so that we continue to deliver our mission in the event of a failure of part of our IT system or the loss of the use of one of our offices.
- Bentley Systems maintains the Cohesive ICT environment design, including firewall rules and approved exceptions, where changes to the design have a clear business case and are approved prior to configuration changes being built, tested, and implemented.
- Bentley Systems maintains a schedule of administration privileges which is subject to approval and periodic review by the Regional Managing Directors.
- Protect information from unauthorised access.
- Assure the confidentiality of the information and maintain the integrity of the information.
- Make information available to authorised persons.
- Ensure we meet regulatory and legislative requirements.
- Produce, maintain, and test business continuity plans.
- Ensure information security training is delivered to all colleagues.
- Ensure all breaches of information security, actual or suspected, are reported, investigated and satisfactorily resolved.

This policy applies to all colleagues and subcontractors that use the Cohesive Companies’ ICT and is subject to the Cohesive Companies ICT rules as detailed in Bentley Global Corporate Systems Information Security Policy supplemented by any additional rules contained within Cohesive’s procedures.



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The Regional Managing Directors are committed to ensuring that this policy is understood and implemented by our colleagues safely, in line with legislation, regulations and codes of practice.

Signed:



Colin Ellam, Chief Executive Officer, Cohesive



