

# **Diversity, Equity & Inclusion**

## **Public Statement**

### **Commitment**

CONCORD commits to a workplace free from unlawful discrimination, harassment, retaliation, and any form of mistreatment, and to the active promotion of diversity, equity, and inclusion in its workforce, leadership, supply chain, and customer-facing services. This commitment is binding on all officers, directors, employees, contractors, agents, interns, applicants, and visitors at all CONCORD sites. This policy of non-discrimination governs all aspects of employment decisions and practices, including but not limited to the following: recruitment or recruitment advertising, hiring, job assignment, promotion, reductions in force, selection for training, education, social and recreation programs, demotions or transfer, rates of pay or other forms of compensation, discipline, termination, and access to benefits. Non-work-related factors will not be taken into account when considering promotions, merit increases or offering trainings for career advancement.

CONCORD will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. The pay of another employee or applicant may not be discussed with or disclosed to persons who are not privy to such information by virtue of their position with CONCORD unless such employee or applicant provides verbal or written consent, either directly or indirectly, or unless otherwise permitted under applicable law. The employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (i) in response to a formal complaint or charge, (ii) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by CONCORD, (iii) consistent with CONCORD's legal duty to furnish information, or (iv) otherwise in accordance with applicable law.

### **Protected Characteristics - Categorical Prohibition**

Discrimination, harassment, or retaliation on the basis of any of the following characteristics is categorically prohibited:

- Race, color, ethnicity, national origin, ancestry, citizenship status;
- Religion, belief, philosophical conviction, political opinion;
- Sex, gender, gender identity, gender expression, sexual orientation;
- Pregnancy, childbirth, related medical conditions, parental status, marital status, family responsibilities;
- Age (with respect to applicable statutory minimums);
- Disability (physical, mental, intellectual, sensory) and perceived disability;

- Genetic information, genetic predisposition;
- Veteran or military status;
- Caste, tribe, or community (relevant in India under the Constitution of India and the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act 1989);
- Trade-union membership or activity, or participation in lawful collective action;
- Health status (including HIV/AIDS status);
- Socio-economic background;
- Any other characteristic protected by applicable law.

Any discriminative act that may impair an employee's dignity or makes them feel uncomfortable based on their individual characteristics is prohibited. CONCORD does not tolerate any discrimination or any other offensive behavior, such as intimidation, insults, threats, bullying, unfair accusations, or any other acts that aim to diminish or devalue a person's worth based on their hierarchical status, gender, sexual orientation or any other characteristic outlined in this section.

### **Pay Equity (binding target)**

CONCORD commits to equal remuneration for work of equal value, irrespective of any protected characteristic. CONCORD monitors and reduces the gender pay gap pursuant to Quantitative Labor & HR Targets with the binding target of maximum 4% adjusted gender pay gap by 2030 - applied at all CONCORD's sites and analyzed separately at each site through Pay Equity Workbook. CONCORD annually tracks pay practices and compare the wages and salaries of the women and men to understand differences and act wherever necessary.

### **Diversity Targets**

CONCORD commits to the following Diversity Targets:

- **Women in workforce** - more than 30% by 2030;
- **Women in management** - more than 30% by 2030;
- **Women in senior leadership** - more than 30% by 2030;
- **Disability representation** is monitored at the local level in accordance with applicable disability law.

### **Reasonable Accommodation**

CONCORD provides reasonable accommodation to qualified individuals with disabilities, to pregnant Personnel, to nursing mothers (including lactation accommodations of time and space), to Personnel with sincerely held religious beliefs or practices, and to other Personnel as required by applicable law. Requests are handled through a documented interactive process with confidentiality protection.

## **Applicable Law**

CONCORD complies with the letter and spirit of all applicable protection against discrimination and equal treatment laws, including local laws in the jurisdictions where CONCORD operate.

## **Training**

All CONCORD's Personnel complete mandatory annual training including site-mandatory components: POSH training in India; state-mandated harassment training in California, New York, Illinois, Connecticut, Washington, Delaware, and Maine where applicable; equality-and-diversity training in the European Union. Managers receive enhanced training on handling complaints, supporting complainants, and avoiding retaliation.

## **Reporting, Investigation, Sanctions**

Employees are prohibited from engaging in any type of unlawful discrimination or harassment. Anyone who believes that they have been the subject of discrimination or harassment should contact their Manager, a Human Resources representative, or raise a concern through the reporting channels.

Reports of discrimination, harassment, sexual harassment, bullying, or retaliation may be made through direct line manager (where appropriate); HR Business Partner; CONCORD Speak-Up Portal; email to [compliance@concordusa.com](mailto:compliance@concordusa.com); statutory Internal Committees / Joint Committees at each site; and external statutory bodies. Investigations are conducted promptly, fairly, and confidentially. Substantiated cases result in proportionate disciplinary action up to and including immediate termination of employment.

CONCORD categorically prohibits retaliation against any person who in good faith raises concern or participates in an investigation, and retaliation against anyone who complains of or witnesses' behavior contrary to this policy. Reversed burden of proof in retaliation analysis applies under the local legislation.