

**CONCORD**

Anti-Bribery and Anti-Corruption

Public Statement

Categorical Zero-Tolerance Commitment

CONCORD operates under a regime of categorical zero tolerance for bribery and corruption in all forms - whether involving public officials or private commercial counterparties, whether direct or indirect, whether attempted or completed, and irrespective of geographic location, transaction size, business custom, or perceived competitive necessity. This commitment is binding on all officers, directors, employees, contractors, agents, intermediaries, joint-venture partners, distributors, and any third party acting for or on behalf of any CONCORD entity. CONCORD requires its business partners - to the extent possible - to be familiar with, understand, and apply the principles set forth in this policy.

Scope and Applicable Law

CONCORD has adopted ABAC policies and procedures to ensure compliance with anti-corruption laws that apply in the countries in which we operate. These ABAC policies and procedures provide important guidance and set out minimum standards that all employees must adhere to when doing business with third parties, including implementing enhanced safeguards regarding our employees' interactions with individuals who work for government entities and companies that are government-owned or controlled (Government Officials).

This policy helps prevent financial or reputational damage to employees, management, or CONCORD arising from corruption-related risks. Violations of this policy are met with firm sanctions, regardless of the rank or position of the individuals involved. Unresolved conflicts of interest can also lead to serious harm. A conflict of interest arises when financial, familial, political, or personal interests could influence our business activities or decisions. This policy facilitates the avoidance or resolution of such conflicts of interest.

The purpose of this policy is to ensure CONCORD's compliance - across all jurisdictions in which it operate - with all applicable anti-bribery and anti-corruption (ABAC) laws and regulations, including, without limitation:

- United States Foreign Corrupt Practices Act of 1977 (15 U.S.C. §§ 78dd-1 et seq.) - anti-bribery provisions and books-and-records provisions; internal accounting controls;
- United Kingdom Bribery Act 2010 (extraterritorial application);
- EU PIF Directive (Directive (EU) 2017/1371) - fraud against the EU financial interests, with criminal-law harmonization;
- OECD Anti-Bribery Convention & United Nations Convention against Corruption.

Specific Prohibitions

CONCORD and all Personnel and third parties acting on CONCORD's behalf are categorically prohibited from:

- Offering, promising, giving, soliciting, demanding, or accepting any bribe, kickback, secret commission, or other improper inducement in any form, to or from any person, public or private, directly or indirectly;
- Making, authorizing, or permitting any facilitation payment to any Public Official in any jurisdiction, irrespective of local custom or legal permissibility;
- Engaging any third party to perform any act that CONCORD would itself be prohibited from performing under this Statement;
- Making any political contribution on behalf of CONCORD, in cash or in kind, except where pre-approved in writing by the General Counsel and the Chief Executive Officer;
- Offering or accepting any gift, entertainment, or hospitality that exceeds the monetary thresholds set out in Anti-Bribery, Anti-Corruption and Gifts Policy, or that is intended or could reasonably be perceived to improperly influence any business decision;
- Falsifying, omitting, concealing, or otherwise misrepresenting any entry in the books and records of any CONCORD entity.

Books and Records Integrity

CONCORD shall maintain books, records, and accounts that accurately and fairly reflect, in reasonable detail, the transactions and dispositions of its assets. The creation, maintenance, or use of any undisclosed or unrecorded fund or asset for any purpose is categorically prohibited. The Chief Financial Officer is accountable for the adequacy of internal accounting controls.

Consequences of Violations

Violation of this Statement may result in criminal liability for the individual (including imprisonment under applicable national law), substantial monetary penalties for CONCORD, reputational harm, and termination of business relationships. CONCORD shall cooperate fully with regulatory and law enforcement authorities in any investigation of conduct related to this Statement and may refer matters for prosecution as required by applicable law.

Third-Party Risk and Business Partner Due Diligence

CONCORD conducts risk-based anti-bribery due diligence on business partners with risk-tiered scrutiny. Higher-risk partners include those operating in high-corruption-perception jurisdictions, those interacting with Public Officials on CONCORD's behalf, those with limited operating history, and those identified through risk screening as warranting enhanced review. Business partners are required to comply with CONCORD's Supplier Code of Conduct and to include anti-bribery representations and warranties in their contractual agreements. CONCORD holds third parties to

the same standards of conduct as its employees and takes a risk-based approach to conducting due diligence on third parties. CONCORD's expectations and requirements relating to its suppliers are set forth in CONCORD's Supplier Code of Conduct, which can be found at concordusa.com/sustainability.

Reporting

CONCORD has provided the opportunity to submit reports any concerns by employees or third parties through the reporting channels: email compliance@concordusa.com, the Speak-Up Portal and by established channels in all CONCORD sites - reports can be submitted verbally, in writing and by email. Personnel reporting suspected irregularities benefit from the comprehensive whistleblower protections set out in Whistleblower and Speak-Up Policy, including CONCORD-wide reversed burden of proof in retaliation analysis under the local legislation.