

**CONCORD**

Code of Business Conduct & Ethics

Public Statement

Commitment

CONCORD USA LLC and all entities under its operational control (CONCORD) are committed to conducting business in accordance with the highest standards of integrity, honesty, accountability, and respect for the law. This Statement is the public articulation of the Code of Business Conduct & Ethics and represents a binding commitment that CONCORD shall always observe, in every jurisdiction in which it operates.

CONCORD conducts all business activities with the highest standards of integrity, honesty, and fairness. Personnel are categorically prohibited from engaging in any form of deception, misrepresentation, fraud, or manipulation in their interactions with customers, suppliers, regulators, or any other stakeholders. Business decisions are based on merit, quality, price, service, and compliance with this policy.

All Personnel are expected to perform their duties with diligence and professional competence, to keep accurate and complete records of business transactions, and to ensure that financial and operational reporting is timely, accurate, and free from material misstatement.

Scope

This commitment applies to: (i) every officer and director of every CONCORD entity in United States, Republic of Bulgaria, and Republic of India; (ii) every employee, regardless of contract type, role, or duration; (iii) every contractor, agent, consultant, intern, secondee, and representative acting for or on behalf of CONCORD; and (iv) where contractually or operationally relevant, every supplier and business partner (operationalized through Supplier Code of Conduct and Standard Sustainability Clauses).

Specific Commitments

- **Compliance with the law** - CONCORD shall comply with the letter and the spirit of all applicable laws, regulations, codes, and binding standards in every jurisdiction in which it operates, including the United States, the Republic of Bulgaria (and the European Union), and the Republic of India. Where local law conflicts with this Statement or any CONCORD Policy, the more protective standard shall apply;
- **Integrity** - Personnel shall not engage in, condone, or tolerate any form of deception, misrepresentation, falsification of records, concealment of material information, or unjust enrichment in connection with CONCORD's activities;

- **Conflicts of interest** - actual, apparent, and potential conflicts of interest shall be disclosed promptly and in writing using Conflict of Interest Declaration. Material undisclosed conflicts shall constitute a serious violation of this Statement;
- **Protection of CONCORD and customer assets** - Personnel shall safeguard CONCORD 's tangible and intangible assets, including physical property, financial resources, intellectual property, confidential business information, personal data of customers and employees, trade secrets, and reputation. Use of CONCORD assets for unlawful or personal purposes is categorically prohibited;
- **Fair dealing** - CONCORD shall deal fairly with its customers, suppliers, competitors, and employees, and shall not engage in deceptive marketing, misrepresentation, manipulation, abuse of confidential information, or anticompetitive coordination;
- **Respect** - CONCORD treats every individual with dignity. Discrimination, harassment, bullying, intimidation, and retaliation are categorically prohibited and shall constitute material grounds for disciplinary action up to and including immediate termination of employment;
- **Accountability** - Personnel are accountable for their conduct, decisions, and the outcomes of work entrusted to them. Where errors occur, they shall be acknowledged promptly and remediated through the documented processes of CONCORD;
- **Stewardship** - CONCORD shall manage its operational, financial, environmental, and social impacts responsibly, including the protection of natural resources, the wellbeing of personnel and value-chain workers, and the responsible use of capital entrusted by investors;
- **Business Relationships** - CONCORD's Dealings with business partners are characterized by trust and fairness. CONCORD contracts fairly, based on the quality and price of software services - contracts are not won by offering, promising, or granting illegal benefits to public sector employees or decision-makers in private industry; and CONCORD follow strict rules with regard to gifts and invitations to business meals and events - implemented through the Anti-Bribery and Anti-Corruption Policy and Anti-Fraud Policy;
- **Digital Ethics** - Big Data analysis and data-driven services play a key role in digital life; therefore, CONCORD employs artificial intelligence (AI) with care. CONCORD strives to ensure that AI makes customers' lives easier and thereby positively impacts societal goals, such as the UN Sustainable Development Goals - a commitment realized through the public Declaration on Responsible AI Principles;
- **Responsibility for CONCORD's Reputation** - CONCORD's reputation is shaped largely by the actions and conduct of every CONCORD employee; the unlawful or inappropriate behavior of even a single employee can cause serious damage to the company. All employees are required to respect, safeguard, and uphold CONCORD's reputation in the course of their work.

Confidentiality and Information Protection

Personnel must protect the confidentiality of all non-public information about CONCORD, its customers, suppliers, employees, and business partners. Confidential information may only be

used for legitimate business purposes and may not be disclosed to unauthorized parties, used for personal gain, or shared with competitors. Confidentiality obligations continue after Personnel leave CONCORD. All information security requirements set out in Information Security and Data Privacy Policy apply concurrently with this policy.

Fair Treatment of Employees

CONCORD is committed to providing a safe, healthy, fair, and respectful workplace for all Personnel. This includes fair wages, reasonable working hours, freedom of association, the right to collective bargaining where applicable, and protection from discrimination, harassment, and retaliation. CONCORD is committed to providing equal opportunities for all and does not treat people differently based on any characteristics or qualities protected by law. Part of CONCORD's corporate culture is to create an environment in which everyone is included and prepared to succeed through talent and hard work, and where everyone is treated with respect and dignity. At all its sites, CONCORD implements measures to provide a safe, accessible and comfortable workplace for all employees, contractors, temporary staff; to ensure the health and safety of all employees, suppliers, visitors and customers, and to protect them from undue risk of injury.

Training, Acknowledgement, Sanctions, Review

Every Personnel shall complete annual mandatory training within ninety (90) days of hire and annually thereafter, sign the Annual Code of Ethics Acknowledgement, and act in accordance with the Code of Business Conduct & Ethics. Violations shall be addressed proportionately to the nature and severity of conduct and may include verbal or written warnings, suspension, demotion, reduction in variable pay, termination of employment, and referral to civil or criminal authorities.

Relations with Third Parties

Within the scope of its legal and financial capabilities, CONCORD supports initiatives in the fields of education, science, social activities, and environmental protection through financial contributions and in-kind donations. Financial funds and in-kind donations are not provided to individuals, to personal bank accounts, to political parties, or to organizations with close ties to political parties. All sponsorship activities require the provision of appropriate and verifiable communication and marketing services by the partner and are conducted with full transparency.

Due Diligence of Business Partners

It is essential for CONCORD to collaborate only with partners who uphold the rule of law and human rights and act with integrity. Therefore, CONCORD conducts due diligence on third parties based on a risk assessment. CONCORD takes all necessary measures to prevent money laundering and the financing of terrorism within its sphere of influence and complies with all

regulations regarding embargoes and sanctions applicable to its operations - implemented through the Tax Transparency and Responsible Tax Policy.

Speaking Up and Non-Retaliation

The provision of information by employees acting in good faith is one of the most effective ways to uncover misconduct within CONCORD and serves as an appropriate measure for identifying serious risks at an early stage. Any employee, as well as any other interested party, may report a violation or suspected violation of legal provisions, the Code of Business Conduct & Ethics, or internal rules - in accordance with the Whistleblower and Speak-Up Policy.

No negative consequences will ensue for individuals who report information in good faith and to the best of their knowledge. Whistleblower protection does not apply if false information is knowingly provided to the detriment of CONCORD or its employees. Alternatively, information may also be submitted to the relevant public authorities in accordance with legal provisions, while preserving the legal protections afforded to whistleblowers.

Anyone who knowingly disseminates false information about other employees or business partners is committing a violation.

Everyone should feel free to speak up without fear of retaliation. CONCORD does not tolerate retaliation against anyone who raises concern or reports suspected or actual misconduct in good faith, or who cooperates in an investigation. Anyone who believes they have been the subject of retaliation or who has witnessed any form of unlawful retaliation should report it immediately. CONCORD maintains multiple confidential channels through which any person may report, in good faith, a known or suspected violation of this Statement or applicable law, including the Speak-Up Portal, email to compliance@concordusa.com, and direct access to the Compliance Officer or the Chairman of ESG Governance Group. Retaliation against any person who reports in good faith shall itself constitute a serious violation of this Statement. The reversed burden of proof in retaliation analysis is applied by CONCORD according to local legislation.