

Commitment

CONCORD commits to respect, protect, and fulfil internationally recognized human rights in its operations and value chain. At CONCORD, respect for universal human rights and the dignity of people is fundamental to our business and CONCORD's commitment to human rights is grounded in the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs). This Statement operationalizes:

- United Nations Guiding Principles on Business and Human Rights ('UNGPs') - corporate responsibility to respect human rights; impact assessment; integration into management systems; tracking effectiveness; communication; remedy;
- OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct;
- International Labor Organization Declaration on Fundamental Principles and Rights at Work including the 2022 amendment recognizing a safe and healthy working environment as a fundamental principle;
- The eight ILO Fundamental Conventions - Forced Labor (No. 29 and No. 105), Freedom of Association (No. 87), Right to Organize and Collective Bargaining (No. 98), Equal Remuneration (No. 100), Discrimination (No. 111), Minimum Age (No. 138), Worst Forms of Child Labor (No. 182), and the two added in 2022 on Occupational Safety and Health (No. 155 and No. 187);
- UN Universal Declaration of Human Rights and the two International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights.

Specific Commitments

CONCORD respects freedom of association, the right to collective bargaining, the prohibition of forced and child labor, as well as principles of non-discrimination in hiring, equal pay, and decent working conditions.

CONCORD strives to ensure that working conditions, working hours, remuneration, and other employment-related aspects comply with internationally recognized labor standards and the legislation of the countries in which it operates.

In accordance with Articles 1 and 2 of the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, CONCORD promotes respect, diversity, fairness, and inclusion in the workplace while combating discrimination.

CONCORD implements various measures to support and encourage respect for human rights:

- Decent working conditions - fair pay, lawful working hours, safe workplaces, adequate rest - implemented through the Labor, Human Rights and Working Conditions Policy;
- Right to privacy - implemented through the Information Security and Data Privacy Policy;

- Right to legal protection and redress - implemented through the Whistleblower and Speak-Up Policy and through external, legally established grievance mechanisms designated for each specific site.

CONCORD is committed to the safety, health, and well-being of its employees and strives to continuously improve its efforts to prevent and minimize occupational risks. This commitment encompasses both physical and mental well-being and is supported by the Occupational Health, Safety and Wellbeing Policy.

CONCORD commits to:

- not tolerating harassment or discrimination based on gender, race, skin color, national origin, age, sexual orientation, gender identity, marital status, veteran status, or any other protected status in accordance with the legislation of the United States, Republic of India, and Republic of Bulgaria;
- supporting equal access to opportunities, skills development, fair treatment, and equal pay for work of equal value for all employees - commitments implemented through the Diversity, Equity, Inclusion, and Anti-Harassment Policy.

Freedom of Association and Collective Bargaining

CONCORD respects Personnel's right to freely form and join unions, workers' councils, or other representative bodies, and to engage in collective bargaining where Personnel choose to do so. At sites with statutory representative bodies (Bulgarian Working Conditions Committee; site H&S committees at India and the USA), CONCORD provides resources, recognition, and good-faith engagement.

Forced Labor, Child Labor, and Modern Slavery

CONCORD prohibits all forms of forced labor, child labor, human trafficking, and modern slavery in its own operations and supply chain. An Annual Modern Slavery Statement is published. All Personnel complete labor and human rights training within 90 days of hire and annually thereafter. Risk-based due diligence is conducted on the supply chain. CONCORD expects its employees to take responsibility for preventing, detecting and reporting instances of modern slavery in any part of CONCORD's business or supply chains. CONCORD has implemented in all CONCORD sites procedures whereby employees can report concerns, including alleged violations. If an employee is unsure whether a particular action, the treatment of workers in general or their working conditions constitutes any of the various forms of modern slavery, the procedures require them to escalate this information to their manager, Compliance Officer, HR, CONCORD Speak-Up Portal; email to compliance@concordusa.com. To encourage reporting by employees or third parties, CONCORD has implemented procedures which protect whistleblowers from retaliation and harmful treatment.

Vulnerable groups

CONCORD recognizes and respects the rights of vulnerable groups worldwide, including individuals and communities that may be at heightened risk of adverse human rights impacts due to marginalization, vulnerability, or other circumstances - whether as individuals or as members of specific groups or populations, such as indigenous peoples, women, children, and persons with

disabilities. CONCORD expects our suppliers to make the same commitment to protecting the rights of vulnerable groups. The rights of these groups are established and enshrined in various international conventions, including:

- UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW);
- UN Convention on the Rights of the Child (CRC);
- International Convention on the Elimination of All Forms of Racial Discrimination (ICERD);
- ILO Convention No. 107 concerning Indigenous and Tribal Populations;
- ILO Convention No. 169 concerning Indigenous and Tribal Peoples;
- UN Declaration on the Rights of Indigenous Peoples (UNDRIP);
- UN Convention on the Rights of Persons with Disabilities (CRPD).

CONCORD supports the communities in the jurisdictions where it operates and is committed to engaging with stakeholders and considering their views while conducting its business.

CONCORD's Supplier Code of Conduct

CONCORD's Supplier Code of Conduct requires our suppliers to commit to protecting the human rights of workers and treating them with dignity and respect. The Supplier Code of Conduct outlines expectations for our supplier's behavior with respect to labor and human rights, health and safety, environmental protection, ethics, and management practices based on international standards. The Supplier Code of Conduct prohibits all forms of modern slavery both within suppliers' business operations and in their supply chains. Suppliers must comply with all applicable laws, regulations, rules, and codes related to modern slavery and not engage in any activity, practice, or behavior that would constitute a violation under applicable modern slavery laws or regulations. The Supplier Code of Conduct sets forth our zero-tolerance policy for modern slavery both in our operations and in our supply chain. Our supplier contracts require suppliers to ensure full compliance with the Supplier Code of Conduct and to comply with all applicable laws, including those related to modern slavery, anti-discrimination, health and safety at work, work permits, anti-bribery and conflict minerals. CONCORD expects participants in our supply chain to adhere to our values and operate in accordance with the principles of the Supplier Code of Conduct and in full compliance with all applicable laws and regulations.

Disclosure of information

CONCORD encourages the reporting of potential issues and monitors its operations and supply chain for impacts on human rights, including potential violations of CONCORD policies. A confidential, externally managed whistleblowing channel is available to employees, suppliers, contractors, and other parties to report incidents or concerns - implemented through the Whistleblower and Speak-Up Policy and via external, statutory grievance mechanisms established for each specific site.

CONCORD reports on its actions and commitment regarding human rights in its annual disclosures, including a discussion of key human rights risks identified within CONCORD's operations and value chain, using a risk-based approach. CONCORD publishes on its website the values, principles, policies, and practices that this policy reinforces.