

Sustainable Procurement

Public Statement

Commitment

CONCORD commits to integrate environmental, social, and governance considerations into procurement decisions throughout the supplier lifecycle, in alignment with the OECD Due Diligence Guidance for Responsible Business Conduct and ISO 20400 Sustainable Procurement. All suppliers and business partners are bound by CONCORD's Supplier Code of Conduct addressing human rights, labor practices, working conditions, OH&S, environment, anti-corruption, anti-fraud, sanctions, conflict minerals, data protection, animal welfare where applicable, and transparency. The Supplier Code is available at concordusa.com/sustainability.

Scope

This Statement applies to all procurement of goods, services, and works for any CONCORD entity, across categories including information-technology infrastructure and software; cloud-hosting and data-center services; professional services; facilities, real estate, and utilities; logistics; office supplies; and capital expenditure.

Principles

- **Risk-based proportionate effort** - diligence depth scales with the spend, criticality, and inherent ESG risk of the supplier relationship;
- **Supplier accountability** - suppliers are accountable for their own conduct and the conduct of their sub-tier suppliers;
- **Continuous improvement** - supplier development is preferred to disengagement where remediation is feasible;
- **Transparency** - supplier performance data is collected, analyzed, and disclosed in aggregate through CONCORD's reporting framework;
- **Sub-tier visibility** - material sub-tier suppliers (Tier 2 and beyond) are identified for conflict-minerals, forced labor, and high-environmental-impact categories;
- **Engagement before disengagement** - termination is the remedy of last resort.

Operational Framework

- Risk Assessment - all Tier 1 suppliers categorized by inherent ESG risk on the basis of category, jurisdiction, spend, and criticality;
- Onboarding and Pre-qualification - all new Tier 1 suppliers subject to ESG pre-qualification before onboarding, including Supplier Code of Conduct acceptance, sanctions screening, and conflict-of-interest screening;
- Self-Assessment Questionnaires - Critical and High-risk Tier 1 suppliers complete an annual SAQ; lower-risk biennial;

- On-Site Audits - risk-prioritized Critical and High-risk Tier 1 suppliers subject to on-site or remote ESG audits with worker-voice components per SMETA or equivalent methodology; third-party SAQ verification of Critical-tier population annually, and 100% of those with prior CAP history;
- Buyer Training - site-specific anti-fraud training;
- Reporting - supplier ESG performance metrics tracked & disclosed annually per GRI 308 & GRI 414.

Supplier Diversity

CONCORD supports the participation of diverse suppliers (women-owned, minority-owned, disability-owned, and small-business suppliers) in its procurement, where qualified suppliers are available. CONCORD does not, however, apply quotas or set-asides that would conflict with applicable law.

CONCORD's Supplier Code of Conduct

CONCORD expects its suppliers shall commit to the highest standards of ethics in conducting all aspects of their business; not to allow bias, conflict of interest or improper influence of others to override their professional judgment and responsibilities, and to voluntarily notify CONCORD of any such conflicts involving CONCORD employees. CONCORD requires its suppliers to protect the reasonable expectations of confidentiality of personal information of everyone with whom they do business, including suppliers, customers, users and employees, and to comply with all applicable legal and regulatory data security requirements. Suppliers must identify and minimize the adverse effects of their manufacturing operations on the community, environment and natural resources, and must safeguard the health and safety of the public. CONCORD requires its suppliers to provide reasonable training related to Supplier Code of Conduct for all workers performing services for, or on behalf of CONCORD.

Reporting

CONCORD's Speak-Up Portal and email compliance@concordusa.com are available to suppliers to report any concerns - reports can be made anonymously. The Compliance Officer reports quarterly to the ESG Governance Group through Quarterly Compliance Dashboard, including statistics on number of reports received, channel of receipt, and remediation actions taken.