



CONCORD Tax Transparency & Responsible Tax

Public Statement

Commitment

CONCORD commits to: (i) compliance with the letter and spirit of all applicable tax laws in every jurisdiction in which CONCORD operates; (ii) alignment of tax outcomes with the location of substantive economic activity and value creation; (iii) absence of artificial structures designed to avoid tax; (iv) absence of operations in jurisdictions listed by the European Union or the Organization for Economic Co-operation and Development as non-cooperative for tax purposes; and (v) transparent disclosure of tax positions and tax payments in accordance with applicable reporting frameworks.

Compliance with Applicable Tax Law

CONCORD complies with the tax laws of the United States, the Republic of Bulgaria (and the European Union), and the Republic of India, and of every other jurisdiction in which CONCORD is subject to tax.

OECD-Aligned Practices

- **OECD Transfer Pricing Guidelines** - intra-CONCORD transactions priced at arm's length; contemporaneous documentation maintained per local-file and master-file requirements where applicable;
- **OECD BEPS Action 13 Country-by-Country Reporting** - prepared and filed where CONCORD exceeds the consolidated revenue threshold;
- **EU Public CbCR Directive (Directive (EU) 2021/2101)** - public CbCR filed via CONCORD Europe where the threshold is triggered;
- **OECD Pillar Two** - 15% global minimum effective tax rate applied to in-scope jurisdictions; readiness maintained;
- **Voluntary alignment with GRI 207 Tax** - narrative disclosure framework adopted in this Statement.

Tax Approach

CONCORD does not utilize aggressive avoidance positions, opaque structures, or shell entities in non-cooperative jurisdictions, nor does it engage in 'profit shifting' as defined under the OECD BEPS framework. CONCORD benefits from generally available tax incentives intended by national legislatures to encourage investment, research and development, or specified activities, where such incentives are aligned with CONCORD's substantive economic activity.

Tax Risk Governance

CONCORD operates a documented tax-risk governance framework with oversight by the Board of Directors. Material tax positions are reviewed by the Head of Tax in consultation with the General

Counsel and the Chief Financial Officer, with external advice obtained for novel or contested matters. Tax reporting to the Board of Directors includes status of material positions, changes to the regulatory environment, and any identified or potential exposures.

Anti-Money Laundering

CONCORD complies with applicable AML and counter-terrorism financing laws including the US Bank Secrecy Act, the USA PATRIOT Act, the EU Anti-Money Laundering Regulation 2024/1624, the Bulgarian ZMIP (Measures Against Money Laundering Act) and ZMFT (Measures Against Financing of Terrorism Act), and the Indian Prevention of Money Laundering Act 2002.

Risk Assessment

CONCORD conducts annual risk assessment of tax, sanctions, export control, and AML risks covering all sites, business lines, customer segments, and country exposures. Results are documented in the Tax Risk Register. Elevated risks are escalated to the Chairman of the ESG Governance Group.

Export Controls

CONCORD complies with applicable export control regimes including the US Export Administration Regulations, the US International Traffic in Arms Regulations where applicable, the EU Dual-Use Regulation (Regulation (EU) 2021/821), and the Indian Foreign Trade (Development and Regulation) Act with SCOMET controls. Personnel involved in cross-border activities involving controlled goods, software, technology, or services must consult the General Counsel for export classification and licensing requirements prior to the activity.

Sanctions Compliance

CONCORD maintains a categorical zero-tolerance regime for any business dealing with sanctioned parties. Personnel must screen all customers, suppliers, business partners, and counterparties against applicable sanctions lists including OFAC SDN and SSI, EU Consolidated List, UK OFSI, India MEA, and UN Security Council lists prior to engagement and on an ongoing basis. Sanctions screening results are recorded in the Sanctions Screening Register (OFAC/EU/UK/UN/India MEA screening). Any positive or potential match must be reported immediately to the Compliance Officer or General Counsel.