



GROUP GOVERNANCE & COMPLIANCE

Anti-Bribery & Anti-Corruption Policy

CONTECH Group

Our zero-tolerance approach to bribery and corruption in all our operations

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1. Policy Statement

CONTECH Group (“CONTECH”, “the Group”, “we”) is committed to conducting business honestly and with integrity. We have a zero-tolerance approach to bribery and corruption in every part of our operations, in every country in which we work, and in our dealings with the public and private sectors alike.

We will not offer, give, request or accept bribes, and we will not use any third party to do so on our behalf. This commitment is led from the top of the Group, and it is not compromised by commercial pressure, local custom or the actions of competitors.

CONTECH’s golden rules

- Never offer, promise, give, request, agree to receive or accept a bribe — directly or through anyone else.
- Never make a facilitation payment.
- Be transparent about gifts and hospitality, keep them modest, and record them.
- Know who you do business with, and never use a third party to do what you could not do yourself.
- **If something feels wrong, do not proceed — seek guidance and report your concern.**

2. Purpose

This Policy explains our anti-bribery and anti-corruption standards, sets out the responsibilities of those who work for and with the Group, and provides guidance on how to recognise and deal with bribery and corruption risks. It forms part of the procedures by which the Group seeks to prevent bribery, consistent with the principles of proportionate procedures, top-level commitment, risk assessment, due diligence, communication and training, and monitoring and review.

3. Scope and Application

This Policy applies across the entire Group, including CONTECH GROUP Ltd (United Kingdom) and CONTECH GROUP sh.p.k. (Kosovo), and any subsidiary, branch or controlled joint-venture operation.

It applies to all directors, officers, employees and workers, and to all third parties who act for or on behalf of the Group, including agents, consultants, intermediaries, joint-venture partners, subcontractors and suppliers. Everyone within scope must comply, and managers must ensure the third parties they engage understand and meet these standards.

4. Key Definitions

- **Bribery** — offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage to induce or reward the improper performance of a function or activity, or where accepting the advantage is itself improper.
- **Corruption** — the abuse of entrusted power or position for private gain.
- **Facilitation payment** — a small, unofficial payment made to secure or speed up a routine action by an official to which the payer is already entitled.
- **Kickback** — the return of a sum already paid or owed, typically as a reward for awarding or facilitating business.
- **Public official** — any person holding a legislative, administrative or judicial position, or otherwise exercising a public function, including employees of state-owned enterprises, public bodies and international organisations.
- **Third party / associated person** — any person or organisation that performs services for or on behalf of the Group, such as agents, consultants, intermediaries, joint-venture partners, subcontractors and suppliers.

5. Legal Framework

5.1 United Kingdom

The Bribery Act 2010 creates offences of: bribing another person (section 1); requesting, agreeing to receive or accepting a bribe (section 2); bribing a foreign public official (section 6); and the corporate offence of failing to prevent bribery by an associated person (section 7). An organisation has a defence to the section 7 offence if it can show it had adequate procedures in place designed to prevent bribery. The Act has extraterritorial reach and can apply to the conduct of the Group and its associated persons anywhere in the world. Individuals may face up to ten years' imprisonment and an unlimited fine; organisations may face an unlimited fine.

5.2 Kosovo and the Western Balkans

The Criminal Code No. 06/L-074 criminalises corruption, including giving and accepting bribes and abuse of official position, and Law No. 08/L-017 establishes the Agency for Prevention of Corruption. Where the Group operates in other Western Balkans jurisdictions, it complies with the applicable anti-corruption laws of each such jurisdiction.

5.3 International standards

Our approach reflects internationally recognised anti-corruption standards, including the principles of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the OECD Guidelines for Multinational Enterprises.

6. What Is Prohibited

No one acting for or on behalf of CONTECH may, directly or through a third party:

- offer, promise or give a bribe or any improper advantage to any person, whether a public official or a private party, to obtain or retain business or any advantage;
- request, agree to receive or accept a bribe or any improper advantage from any person;
- make, offer or authorise a facilitation payment or a kickback; or
- threaten or retaliate against anyone who has refused to take part in bribery or who has raised a concern in good faith.

These prohibitions apply regardless of local custom or practice and regardless of what competitors may do.

7. Gifts and Hospitality

This Policy does not prohibit normal and appropriate business gifts and hospitality. Such gifts and hospitality are acceptable only where they are: given openly and transparently; reasonable, proportionate and of modest value; not cash or a cash equivalent; not intended to influence, and not capable of appearing to influence, any decision improperly; lawful and permitted under the Group's internal rules; and not offered or accepted around the time of a tender, negotiation or decision.

Gifts or hospitality above the threshold set in the Group's internal rules must be approved in advance and recorded in the Group's gifts and hospitality register, maintained by the Group's nominated compliance contact. Gifts or hospitality to or from public officials require particular caution and prior approval.

8. Facilitation Payments

Facilitation payments are prohibited, even where they are of small value or are customary locally. If you are asked to make one, you should decline and report it. The only exception is where there is an imminent threat to a person's health, safety or liberty and a payment cannot reasonably be avoided; any such payment must be reported to the nominated compliance contact as soon as possible and recorded accurately.

9. Donations, Sponsorship and Political Contributions

- Charitable donations may be made only to bona fide organisations, must be transparent and properly recorded, and must never be used as, or to disguise, a bribe.
- Sponsorships must have a genuine business rationale and be documented and approved.
- The Group does not make political donations on its behalf without Board authorisation. Personal political activity must be conducted privately and must not imply Group endorsement.

10. Working with Third Parties and Due Diligence

The Group can be held responsible for bribery committed by associated persons acting on its behalf. Because third parties are a significant source of bribery risk, we apply risk-based controls when engaging them:

- carry out proportionate due diligence before appointing agents, consultants, intermediaries, joint-venture partners and other higher-risk third parties, and keep it under review;
- include appropriate anti-bribery obligations, audit and termination rights in contracts;
- ensure that fees, commissions and payments are reasonable, justified by genuine services, properly documented and paid transparently; and
- never engage a third party to do anything that this Policy would prohibit the Group from doing directly.

11. Public Officials and Public Procurement

Dealings with public officials — including in relation to permits, licences, inspections, approvals and public tenders — carry heightened risk and require particular care. We do not make or offer improper payments to obtain permits or to win or retain public contracts, we comply with applicable public-procurement rules and conflict-of-interest requirements, and we are transparent in our interactions with public bodies.

12. Conflicts of Interest

Conflicts of interest can give rise to corruption risk. You must avoid situations in which personal, family or financial interests could improperly influence, or appear to influence, a business decision, and you must promptly declare any actual, potential or perceived conflict so that it can be managed.

13. Books, Records and Financial Controls

Accurate records are a key defence against bribery and corruption. All accounts, invoices, expense claims and other records must be complete, accurate and transparent. No undisclosed or unrecorded funds or accounts may be established, no false or misleading entry may be made, and all payments must have a clear and legitimate business purpose supported by appropriate documentation.

14. Recognising Red Flags

The following are examples of warning signs that may indicate a bribery or corruption risk. They are not exhaustive, and the presence of a red flag calls for caution and, where appropriate, escalation:

- a third party requests unusual payment arrangements — for example, in cash, upfront, to an offshore or third-country account, or to a person other than the counterparty;
- a commission, fee or discount appears excessive relative to the services genuinely provided;
- a third party is recommended by, or connected to, a public official, or insists on using a particular intermediary;
- a request is made for a payment to expedite a permit, inspection, clearance or approval;
- invoices are vague, lack supporting detail, or are for unspecified “consulting” or “success” fees;
- a gift or hospitality is offered or requested around the time of a tender, negotiation or decision; or

- a third party refuses to accept anti-bribery contract terms or to provide due-diligence information.

15. Roles and Responsibilities

- **The Board and Group CEO** provide top-level commitment, approve this Policy, and foster a culture in which bribery is never acceptable.
- **Executive management** ensure that proportionate procedures, resources, due-diligence arrangements, the gifts and hospitality register and training are in place and effective.
- **The nominated compliance contact** maintains the register, advises on approvals and due diligence, and coordinates training and monitoring.
- **Line managers** apply this Policy in their areas, oversee the third parties they engage, and escalate concerns.
- **All personnel and third parties** must comply with this Policy and report any actual or suspected breach.

16. Raising Concerns and Whistleblower Protection

If you are offered a bribe, are asked to make one, suspect that bribery or corruption has occurred or may occur, or are unsure whether something is permitted, you must speak up. Concerns may be raised with your line manager, the nominated compliance contact, or in confidence through the Group's dedicated channel at ethics@contech.biz.

The Group prohibits retaliation against anyone who refuses to take part in bribery or who raises a concern in good faith, even if this results in the Group losing business. Reporting is supported by whistleblower-protection law, including Law No. 06/L-085 in Kosovo and the Public Interest Disclosure Act 1998 in the United Kingdom.

17. Training, Communication, Monitoring and Review

We communicate this Policy to our people and, where appropriate, to the third parties we engage, and we provide risk-based training so that responsibilities are understood. We monitor the effectiveness of our anti-bribery procedures, including the operation of the gifts and hospitality register and third-party due diligence, and we improve them where needed.

18. Breaches and Consequences

Breach of this Policy is a serious matter. For employees, it may result in disciplinary action up to and including dismissal. For third parties, it may result in termination of the contract or engagement. Bribery and corruption are also criminal offences that can expose individuals to imprisonment and fines and the Group to unlimited fines, debarment from public contracts and serious reputational harm. Suspected criminal conduct may be referred to the competent authorities.

19. Governance, Ownership and Review

This Policy is approved by the Group Chief Executive Officer on behalf of the Board and is owned by Group Executive Management. It forms part of the Group's wider governance framework, alongside the Code of Conduct and Business Ethics and related policies on conflicts of interest, gifts and hospitality, whistleblowing and procurement. It will be reviewed at least annually, and sooner if required by changes in law, in the Group's structure or in its risk profile.

Approved on behalf of CONTECH Group

Name	Gazmend Kelmendi
Position	Group Chief Executive Officer
Date of approval	11 May 2026

Contact

Questions about this Policy may be directed to the nominated compliance contact or to **info@contech.biz**. Concerns may be reported in confidence to **ethics@contech.biz**.

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