



GROUP GOVERNANCE

Code of Conduct and Business Ethics

CONTECH Group

The standards of behaviour we expect of everyone who works for and with CONTECH

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Contents

Message from the Chief Executive.....	3
1. Introduction and Purpose.....	4
2. Scope and Application.....	4
3. Our Values and Ethical Principles.....	4
4. Responsibilities.....	4
5. Compliance with the Law and this Code.....	5
6. Our People and Workplace.....	5
7. Business Integrity.....	6
8. Working with Clients, Partners and Suppliers.....	7
9. Company Assets and Information.....	7
10. Quality, Environment and Communities.....	7
11. Speaking Up — Raising Concerns.....	8
12. Compliance, Breaches and Consequences.....	8
13. Governance, Ownership and Review.....	8
14. Acknowledgement and Commitment.....	8
Contact.....	9

Message from the Chief Executive

At CONTECH, our reputation rests on more than the quality of what we build. It rests on how we behave — with our clients and partners, with the communities in which we work, and with one another. This Code of Conduct sets out, in one place, the standards of behaviour we expect of everyone who works for and with our Group.

We operate across the United Kingdom, Kosovo and the wider Western Balkans, in an industry where trust is earned on every project and can be lost in a single decision. The commitments in this Code — to safety, integrity, fairness and respect — are not optional. They apply equally to our directors, our engineers on site, our office teams and the partners and suppliers who work alongside us.

I ask every colleague to read this Code, to apply it in their daily work, and to speak up whenever something does not look right. Raising a concern in good faith is not disloyalty; it is exactly what this Code asks of you, and no one will suffer any disadvantage for doing so.

Building trust and delivering excellence are the foundations of our business. Living up to this Code is how we protect both.

Gazmend Kelmendi

Group Chief Executive Officer

1. Introduction and Purpose

CONTECH Group (“CONTECH”, “the Group”, “we”) is an international engineering, construction and infrastructure organisation. This Code of Conduct and Business Ethics (“the Code”) is our central statement of the ethical standards and behaviours that govern how we work.

The purpose of the Code is to:

- translate our values into clear, practical standards of behaviour;
- help everyone recognise and respond to ethical and compliance risks in their day-to-day work;
- protect our people, our clients, our partners and our reputation; and
- support compliance with the laws of the jurisdictions in which we operate and with recognised international standards.

The Code cannot describe every situation. Where it does not give a specific answer, we expect sound judgement guided by our values, and we expect people to seek guidance when in doubt.

If you are unsure, ask yourself:

Is it legal, and consistent with this Code and our policies?

Is it honest, fair and free from any conflict of interest?

Would it withstand scrutiny — from our clients, the public or a regulator?

If the answer to any of these is “no”, or you are not sure, stop and seek guidance before acting.

2. Scope and Application

The Code 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, workers, agency staff, secondees, interns and apprentices. We also expect contractors, subcontractors, consultants, suppliers, agents and joint-venture partners to act consistently with the principles of this Code when working with or for the Group, and we may reflect this expectation in our contracts.

Where local law sets a higher standard than this Code, the higher standard applies. Nothing in this Code overrides any obligation under applicable law.

3. Our Values and Ethical Principles

Our conduct is guided by a small number of principles that apply to everything we do:

- **Safety first.** We protect the health, safety and wellbeing of our people, our partners and the public, on every site and in every office.
- **Integrity.** We are honest and act with integrity. We do not offer, give, solicit or accept bribes, and we compete fairly.
- **Respect.** We treat everyone with dignity and respect, value diversity, and do not tolerate discrimination, harassment or bullying.
- **Accountability.** We take responsibility for our actions, keep accurate records, and speak up when something is wrong.
- **Excellence.** We deliver quality work, protect the environment, and honour the commitments we make.

4. Responsibilities

Upholding the Code is a shared responsibility.

- **The Board and Group CEO** set the tone from the top, approve the Code, and are accountable for a culture of integrity across the Group.
- **Executive management** (including the Managing Directors / COOs and the CFO) ensure the necessary policies, controls, training and resources are in place and lead by example.
- **Line managers** apply the Code fairly, create an environment in which people feel able to speak up, and escalate concerns appropriately.
- **All personnel** are responsible for reading and following the Code, completing required training, and reporting conduct that is inconsistent with it.
- **Partners and suppliers** are expected to uphold equivalent standards when working with the Group.

5. Compliance with the Law and this Code

We comply with all applicable laws and regulations wherever we operate. The Code is intended to align with, and in some areas to go beyond, these legal requirements. The principal frameworks include the following.

5.1 United Kingdom (Group headquarters)

- **Bribery Act 2010**; Modern Slavery Act 2015; Competition Act 1998 and Enterprise Act 2002; Health and Safety at Work etc. Act 1974; Equality Act 2010; Public Interest Disclosure Act 1998; Proceeds of Crime Act 2002 and the Money Laundering Regulations; and UK data protection legislation (UK GDPR and the Data Protection Act 2018).

5.2 Kosovo and the Western Balkans (regional hub)

- **Criminal Code No. 06/L-074** (corruption, fraud and related offences); Law No. 08/L-017 on the Agency for Prevention of Corruption; Law No. 08/L-056 on Protection of Competition; Law No. 05/L-096 on the Prevention of Money Laundering and Combating Terrorist Financing; Law No. 06/L-085 on the Protection of Whistleblowers; Law No. 03/L-212 on Labour; Law No. 04/L-161 on Safety and Health at Work; Law No. 05/L-021 on the Protection from Discrimination and Law No. 05/L-020 on Gender Equality; and the Law on Personal Data Protection.

Where the Group's activities extend to other Western Balkans jurisdictions, we comply with the applicable local laws of each such jurisdiction, in every case applying standards no lower than those set out in this Code.

5.3 International standards

- The fundamental Conventions of the International Labour Organization (ILO); the UN Guiding Principles on Business and Human Rights; the OECD Guidelines for Multinational Enterprises; and the principles of the UN Global Compact.

6. Our People and Workplace

6.1 Health, safety and wellbeing

Nothing we do is worth an injury. We are committed to preventing harm on our sites and in our workplaces. Everyone must follow safety rules and method statements, use the protective equipment provided, report hazards, near-misses and incidents, and stop work that cannot be done safely. No one will be penalised for stopping unsafe work.

6.2 Diversity, equity, inclusion and equal opportunity

We are an equal opportunity employer. We recruit, develop, reward and promote on the basis of merit, and we do not discriminate on the basis of any characteristic protected by applicable law. This commitment is set out in full in our Diversity, Equity & Inclusion and Equal Opportunity Policy, which forms part of this Code.

6.3 Dignity at work

We treat colleagues and others with dignity and respect. Harassment, sexual harassment, bullying, intimidation and violence have no place at CONTECH and will not be tolerated, whether in our offices, on our sites, or in work-related communications and events.

6.4 Human rights and labour standards

We respect internationally recognised human rights. We do not use or tolerate forced labour, child labour, human trafficking or modern slavery in any part of our operations or supply chain, and we expect our suppliers and subcontractors to meet the same standard. We pay fair wages, respect working-time and rest requirements, and uphold freedom of association in accordance with applicable law.

7. Business Integrity

7.1 Anti-bribery and corruption

We have zero tolerance for bribery and corruption. No one acting for CONTECH may offer, promise, give, request, agree to receive or accept any bribe or improper advantage — directly or through a third party — to obtain or retain business or any improper advantage. This applies to dealings with both public officials and private parties.

7.2 Gifts and hospitality

Modest, occasional and proportionate business gifts and hospitality may be acceptable, but only where they are transparent, reasonable, lawful, not intended to influence a decision improperly, and permitted under our internal rules. Anything that could create an obligation or the appearance of one must be declined or referred for approval. Gifts of cash or cash equivalents must never be offered or accepted.

7.3 Facilitation payments

We prohibit facilitation payments — small unofficial payments made to secure or speed up routine actions — even where they may be customary locally. If you are asked for one, decline and report it.

7.4 Conflicts of interest

A conflict of interest arises when personal, family or financial interests could improperly influence — or appear to influence — a business decision. Examples include awarding work to a business connected to a relative, or holding an interest in a competitor, supplier or client. You must avoid conflicts where possible and promptly declare any actual, potential or perceived conflict so that it can be managed.

7.5 Fraud, theft and dishonesty

We do not tolerate fraud, theft, embezzlement, forgery or any other form of dishonesty. All transactions must be genuine, properly authorised and accurately recorded.

7.6 Anti-money laundering

We take reasonable steps to know who we do business with and to ensure that funds we receive are from legitimate sources. Anyone who becomes aware of suspicious transactions or attempts to launder money must report them immediately.

7.7 Fair competition

We compete vigorously but fairly, and comply with competition and antitrust law. We do not enter into unlawful arrangements with competitors — such as price-fixing, bid-rigging or market-sharing — and we do not misuse confidential competitor information.

7.8 Sanctions and trade controls

We comply with applicable trade sanctions and export-control requirements and do not engage in prohibited dealings with sanctioned parties or destinations.

7.9 Political activity and contributions

CONTECH remains politically neutral as an organisation. We do not make political donations on behalf of the Group without appropriate authorisation. Personal political activity must be conducted in a private capacity and must not imply Group endorsement.

8. Working with Clients, Partners and Suppliers

8.1 Integrity in the supply chain

We select subcontractors, suppliers, consultants and agents on objective criteria and expect them to act consistently with the standards in this Code. We apply proportionate due diligence, particularly where a third party acts on our behalf, and we do not use third parties to do anything we could not properly do ourselves.

8.2 Public procurement and tenders

When bidding for and delivering public and private contracts, we act with honesty and transparency. We provide accurate information in tenders, honour confidentiality and conflict-of-interest requirements, and never seek to influence a procurement decision through improper means.

8.3 Fair dealing

We deal fairly with clients, partners and suppliers. We honour our commitments, describe our services and capabilities accurately, and resolve disputes professionally and in good faith.

9. Company Assets and Information

9.1 Protection and proper use of assets

We protect the Group's assets — including funds, equipment, materials, premises and systems — against loss, damage, theft and misuse, and we use them for legitimate business purposes.

9.2 Confidential information and intellectual property

We safeguard the Group's confidential information and intellectual property, and we respect that of our clients and partners. Confidential information must not be disclosed or used improperly, during or after employment.

9.3 Data protection and privacy

We handle personal data lawfully, fairly and securely, and only for legitimate purposes, in accordance with the Kosovo Law on Personal Data Protection and, for the United Kingdom, UK data protection legislation (UK GDPR and the Data Protection Act 2018).

9.4 Accurate records and financial integrity

We keep complete, accurate and timely books, records and reports. No undisclosed or unrecorded funds or accounts may be established for any purpose, and no entry may be false or misleading. Records are retained and disposed of in accordance with applicable law and Group policy.

9.5 Communications, IT and social media

We use the Group's IT and communication systems responsibly and securely. When speaking publicly or on social media, we do not present personal views as those of the Group, and we protect confidential information and the Group's reputation.

10. Quality, Environment and Communities

10.1 Quality and professional standards

We deliver work that meets the required technical, contractual and professional standards, and we do not compromise quality or safety to save time or cost.

10.2 Environmental responsibility

We manage the environmental impact of our activities, comply with environmental law and permits, and support the Group's wider environmental, social and governance (ESG) commitments.

10.3 Communities and social responsibility

We seek to be a responsible neighbour, to minimise disruption from our works, and to contribute positively to the communities in which we operate.

11. Speaking Up — Raising Concerns

If you become aware of any conduct that may breach this Code, the law or our policies, you must raise it. Speaking up in good faith protects our people and our business.

- **How to raise a concern** — concerns may be raised with your line manager, with executive management, or in confidence through the Group's dedicated channel at ethics@contech.biz.
- **No retaliation** — we prohibit retaliation of any kind against anyone who raises a concern in good faith or assists an investigation. Retaliation is itself a breach of this Code.
- **How concerns are handled** — concerns are treated seriously and, so far as possible, confidentially, and are investigated fairly and proportionately.
- **External reporting** — individuals retain any right to report to the competent authorities, including the Ombudsperson Institution and the Agency for Prevention of Corruption in Kosovo, and equivalent bodies in the United Kingdom. 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.

12. Compliance, Breaches and Consequences

Compliance with this Code is a condition of working for and with CONTECH. A breach is treated seriously and, depending on the circumstances, may result in disciplinary action up to and including dismissal, termination of a contract or engagement, and referral to the competent authorities. Certain conduct may also give rise to personal civil or criminal liability.

13. Governance, Ownership and Review

This Code is approved by the Group Chief Executive Officer on behalf of the Board and is owned by Group Executive Management. It is supported by more detailed policies and procedures, including those on health and safety, diversity and equal opportunity, anti-bribery and corruption, conflicts of interest, whistleblowing, data protection, and procurement. The Code will be reviewed at least annually, and sooner if required by changes in law, in the Group's structure or in operating practice.

14. Acknowledgement and Commitment

Everyone within scope of this Code is expected to acknowledge that they have read and understood it and will comply with it. Managers are responsible for ensuring their teams have access to the Code and the opportunity to ask questions about it.

Approved on behalf of CONTECH Group

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

Contact

Questions about this Code may be directed to Group Executive Management or to **info@contech.biz**. Concerns may be reported in confidence to **ethics@contech.biz**.

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