



GROUP GOVERNANCE & COMMUNITY

Corporate Social Responsibility Policy

CONTECH Group

How we act as a responsible business and invest in our communities — together with the Kelmendi Foundation

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1. Policy Statement

CONTECH Group (“CONTECH”, “the Group”, “we”) is committed to being a responsible business and a positive contributor to the communities and societies in which we work. We believe that how we deliver our projects — safely, ethically and sustainably — matters as much as what we build, and that a successful business should give back to the communities that make its success possible.

Our corporate social responsibility has two dimensions: the way we run our business responsibly every day, set out across our governance, people, safety, ethics and environmental policies; and our community investment and philanthropy, which we carry out together with the Kelmendi Foundation. This Policy sets out both.

Our corporate social responsibility means:

- running our business responsibly — safe, fair, ethical and environmentally sound;
- investing in our communities through the Kelmendi Foundation;
- contributing through donations, volunteering, expertise and project-linked initiatives;
- acting transparently, at arm’s length and with strong governance; and
- **measuring our impact and improving over time.**

2. Purpose

This Policy explains our approach to corporate social responsibility — both how we conduct our business responsibly and how we invest in our communities — and how we govern our community investment with integrity and transparency.

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 covers our operations and projects and applies to all directors, officers, employees and workers.

It also informs how we engage with our communities, clients, suppliers and partners.

4. Our Approach to Corporate Social Responsibility

We see corporate social responsibility as an extension of our values, not a separate activity. It has two parts. First, we act responsibly in everything we do — protecting people, upholding high ethical standards, respecting human rights, and caring for the environment; these commitments are delivered through the Group’s policies. Second, we invest in the long-term wellbeing of our communities, channelling our community investment through the Kelmendi Foundation so that it is professionally governed, measurable and lasting.

Our approach is informed by internationally recognised frameworks, including the UN Sustainable Development Goals, and it complements our Sustainability Policy, which sets out our wider environmental, social and governance commitments.

5. Responsible Business Conduct

Responsible business begins with how we operate. Across the Group we are committed to:

- **our people** — the health, safety and wellbeing of everyone affected by our work, and a fair, diverse and inclusive workplace (Health and Safety Policy; Diversity, Equity & Inclusion Policy);
- **ethical conduct** — acting with integrity and maintaining a zero-tolerance approach to bribery and corruption (Code of Conduct and Business Ethics; Anti-Bribery and Anti-Corruption Policy);
- **human rights** — respecting human rights and preventing modern slavery in our operations and supply chain (Human Rights Policy; Modern Slavery Policy);

- **the environment** — protecting the environment and building sustainably (Environmental Policy; Sustainability Policy); and
- **quality and value** — delivering quality work and value for our clients (Quality Policy).

These commitments are the foundation of our corporate social responsibility.

6. Community Investment and the Kelmendi Foundation

We carry out our community investment and philanthropy together with the Kelmendi Foundation — an independent, non-profit, public-benefit institution established by the Kelmendi Family and Kelmendi Holdings Ltd. Channelling our community investment through a permanent, professionally governed institution helps ensure that our contribution is measurable, transparent and built to last.

The Foundation's mission is to mobilise resources, knowledge, partnerships and innovation to improve lives, empower communities, advance education, promote health, support humanitarian causes, protect the environment and foster sustainable development — beginning in Kosovo and the wider region, and extending over time across Europe and worldwide.

7. How CONTECH Contributes

We contribute to, and work alongside, the Foundation through:

- aligned corporate CSR and ESG programmes;
- corporate donations and community investment;
- employee volunteering, skills and professional expertise; and
- project-linked community initiatives that create local social value where we build.

Our contributions are made on an arm's-length basis, consistent with the Foundation's governance and conflict-of-interest policies.

8. Where Our Community Investment Goes

Through the Foundation, our community investment supports a number of strategic pillars, including:

- **humanitarian and charitable** causes — food, shelter, disaster relief and social care;
- **education and skills** — scholarships, vocational and technical training, STEM and research;
- **youth development** — mentorship, entrepreneurship and fellowship programmes;
- **women's empowerment** — education, leadership, entrepreneurship and inclusion;
- **health and wellbeing** — healthcare access, prevention and medical infrastructure;
- **sustainability and climate** — renewable energy, reforestation, water and the circular economy;
- **research and innovation** — applied science, engineering and clean-energy technology; and
- **community development** — infrastructure, public spaces and social cohesion.

Many of these connect naturally to our work as an engineering and construction group, allowing us to contribute expertise as well as funding.

9. Governance, Independence and Conflicts of Interest

We are committed to carrying out our community investment with integrity, transparency and strong governance.

- **Arm's-length basis** — our contributions to the Foundation are made on an arm's-length basis. The Foundation operates independently under its own governance, including its board of trustees and its audit, risk and compliance arrangements.
- **Managing conflicts of interest** — because the Foundation was established by the Kelmendi Family and Kelmendi Holdings Ltd, we recognise the importance of managing actual and perceived conflicts of interest. Related-party matters are handled transparently, with appropriate approvals and oversight, and consistently with the Foundation's conflict-of-interest policies.

- **Compliance and anti-bribery** — charitable donations and community contributions are never used to improperly influence any person, to secure or retain business, or as a route for a bribe. All contributions comply with our Anti-Bribery and Anti-Corruption Policy and are properly approved, recorded and made only to legitimate, verified recipients.
- **Legitimate purpose** — community contributions are made for genuine public-benefit purposes. Any political donations are dealt with separately under our Anti-Bribery and Anti-Corruption Policy and are not part of our community investment.

10. Transparency, Measurement and Reporting

We believe impact should be evidenced, not merely announced. Working with the Foundation, we support a results-based approach to community investment. The Foundation commits to transparency, including annual audited financial statements and impact, governance and grant reporting. We seek to report on our own corporate contributions and community initiatives as part of our wider sustainability reporting.

11. Related Policies

This Policy should be read together with the Sustainability Policy; the Code of Conduct and Business Ethics and the Anti-Bribery and Anti-Corruption Policy; the Health and Safety Policy; the Diversity, Equity & Inclusion and Equal Opportunity Policy; the Human Rights Policy and the Modern Slavery Policy; the Environmental Policy; and the Quality Policy.

12. Governance, Review and Continual Improvement

This Policy is approved by the Group Chief Executive Officer on behalf of the Board and is owned by Group Executive Management. We are committed to strengthening our community investment and its governance over time. This Policy will be reviewed at least annually, and sooner if required by changes in our business, our community programmes, or applicable law.

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 Group Executive Management or to **info@contech.biz**. Concerns may be reported in confidence to **ethics@contech.biz**.

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