



GROUP GOVERNANCE & ENVIRONMENT

Environmental Policy

CONTECH Group

Our commitment to protecting the environment and managing our environmental impacts

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1. Policy Statement

CONTECH Group (“CONTECH”, “the Group”, “we”) is committed to protecting the environment and to managing the environmental impacts of its engineering, construction and infrastructure activities. We recognise that our work affects the environment and the communities around us, and we are determined to prevent pollution, use resources responsibly, reduce our carbon footprint, and fulfil our compliance obligations.

We manage our environmental responsibilities through an environmental management system aligned with the ISO 14001 standard, and we are committed to the continual improvement of our environmental performance. This Policy provides the framework within which we set and review our environmental objectives.

Our core environmental commitments:

- protect the environment and prevent pollution;
- use energy, water and materials efficiently, and reduce waste and carbon;
- fulfil our compliance obligations — legal requirements and other commitments we adopt;
- provide a framework for setting and reviewing environmental objectives; and
- **continually improve our environmental performance and management system.**

2. Purpose

This Policy sets out our environmental commitments, the standards we apply across our operations and projects, and how we manage our environmental impacts. It provides the framework for our environmental objectives and underpins our environmental management system.

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 offices, project sites and activities, and applies to all directors, officers, employees and workers.

It also sets out our expectations of the suppliers, subcontractors, consultants and partners who work with us.

4. Our Environmental Commitments

- **Compliance** — we comply with applicable environmental legislation, permits and consents, and with the other environmental requirements we adopt.
- **Pollution prevention** — we prevent pollution of air, water and land, and control dust, noise, vibration and emissions from our sites and activities.
- **Climate and energy** — we measure and work to reduce our greenhouse gas emissions and improve energy efficiency.
- **Resource efficiency and the circular economy** — we use materials efficiently, design out waste where we can, and favour reused, recycled and responsibly sourced materials.
- **Waste management** — we apply the waste hierarchy (prevent, reuse, recycle, recover, then dispose), manage construction and demolition waste responsibly, handle hazardous waste safely and lawfully, and never fly-tip or unlawfully burn waste.
- **Water** — we use water efficiently and protect watercourses and groundwater from pollution.
- **Biodiversity and land** — we protect habitats, species and soils, avoid and minimise harm to biodiversity, and seek opportunities to enhance nature where we can.
- **Sustainable design, materials and procurement** — we consider environmental performance and whole-life impacts in design and procurement, and choose sustainable materials and suppliers where practicable.

5. Legal and Other Requirements

5.1 United Kingdom

Environmental legislation including the Environmental Protection Act 1990, the Environment Act 2021, the Climate Change Act 2008 (which sets the United Kingdom's legally binding target of net zero greenhouse gas emissions by 2050), the Environmental Permitting (England and Wales) Regulations 2016, and waste duty-of-care requirements.

5.2 Kosovo

The Constitution of the Republic of Kosovo, which guarantees the right to environmental protection (Article 59); Law No. 03/L-025 on Environmental Protection; Law No. 08/L-181 on Environmental Impact Assessment; Law No. 08/L-025 on Air Protection from Pollution; and the applicable legislation on waste, water and nature protection. The competent authority is the Ministry of Environment, Spatial Planning and Infrastructure, supported by the Kosovo Environmental Protection Agency. Where we operate elsewhere in the Western Balkans, we comply with applicable local law.

5.3 Other requirements

In addition to legal requirements, we have regard to the ISO 14001 standard for environmental management, the Paris Agreement on climate change, and the environmental requirements of our clients and contracts.

6. Our Environmental Management System

We manage our environmental impacts through an environmental management system (EMS) aligned with ISO 14001. Through the EMS we:

- identify the environmental aspects of our activities and the impacts they can have;
- determine and keep track of our compliance obligations;
- set environmental objectives and targets, and plan how to achieve them;
- put in place operational controls, including on our project sites; and
- monitor, review and continually improve our environmental performance.

Environmental responsibilities are integrated into how we plan, design and deliver our projects, rather than treated as a separate activity.

7. Managing Impacts on Our Projects and Sites

Our most significant environmental impacts arise on our project sites. For our projects we:

- comply with environmental permits, consents and the outcomes of any environmental impact assessment;
- put in place site-specific environmental controls and, where appropriate, environmental management plans;
- monitor our environmental impacts and keep appropriate records;
- prevent, and respond promptly to, spills, leaks and other environmental incidents; and
- engage with local communities and authorities on environmental matters that affect them.

8. Roles and Responsibilities

- **The Board and Group CEO** provide leadership on environmental matters, approve this Policy, and ensure the resources needed to deliver it.
- **Executive management** embed this Policy into operations, ensure the environmental management system and competent advice are in place, and oversee objectives and performance.
- **Project and site managers** implement environmental controls, permits and management plans on site, and respond to environmental incidents.
- **The environmental adviser or competent person** provides expert advice and supports the operation of the environmental management system.

- **All personnel** work in an environmentally responsible way and report environmental concerns and incidents.
- **Business partners** are expected to meet the standards in this Policy.

9. Competence, Training and Awareness

We ensure that those whose work can have a significant environmental impact are competent to carry it out. We provide environmental awareness and role-specific training so that our people understand this Policy, the environmental impacts of their work, their responsibilities, and the consequences of not following environmental controls.

10. Emergency Preparedness and Response

We identify the potential environmental emergencies that could arise from our activities — such as spills, leaks or uncontrolled releases — and we maintain arrangements to prevent them and to respond quickly and effectively if they occur, so as to limit environmental harm. We review these arrangements in the light of incidents and tests.

11. Monitoring, Objectives and Continual Improvement

We set environmental objectives and targets, monitor and measure our performance against them, and review environmental incidents and near-misses so that we learn and improve. We periodically evaluate our compliance with legal and other requirements, and we are committed to the continual improvement of our environmental performance and management system.

12. Communication

We communicate this Policy to everyone working for and on behalf of the Group, and we make it available to interested parties, including clients, partners, regulators and the public. We engage constructively with stakeholders on the environmental aspects of our work.

13. Breaches, Governance and Review

Breach of this Policy is a serious matter. For employees, it may result in disciplinary action up to and including dismissal; for business partners, it may result in corrective action and, where appropriate, suspension or termination of the relationship. Environmental offences can also carry significant fines and other legal sanctions, and suspected breaches of environmental law may be referred to the competent authorities.

This Policy is approved by the Group Chief Executive Officer on behalf of the Board and is owned by Group Executive Management. It should be read together with the Group's Health and Safety Policy, Code of Conduct and Business Ethics, the Supplier and Subcontractor Codes of Conduct, and any Sustainability or ESG policy the Group adopts. It will be reviewed at least annually, and sooner if required by changes in law, in the Group's structure or in its activities.

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. Environmental concerns may also be reported in confidence to ethics@contech.biz.

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