



GROUP GOVERNANCE & COMPLIANCE

Ethics and Compliance Policy

CONTECH Group

Our framework for acting with integrity and complying with the law across the Group

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1. Policy Statement

CONTECH Group (“CONTECH”, “the Group”, “we”) is committed to conducting business ethically, with integrity, and in compliance with all applicable laws and regulations in every jurisdiction in which we operate. Doing the right thing is fundamental to how we work and to the trust our clients, partners, employees and communities place in us.

This Policy establishes the framework — our ethics and compliance programme — through which the Group promotes ethical conduct, prevents and detects wrongdoing, and ensures compliance across all its activities. It is led from the top and applies to everyone connected with the Group.

The pillars of our ethics and compliance programme:

- Leadership and tone from the top — our leaders set the standard and model ethical behaviour.
- Clear standards — a coherent framework of policies and procedures that everyone can access.
- Risk assessment and due diligence — we understand our risks and manage them.
- Training, communication and advice — people know their obligations and where to get help.
- Speaking up without fear — safe channels to raise concerns, and no retaliation.
- **Monitoring, enforcement and continual improvement — we check, we act, and we improve.**

2. Purpose

The purpose of this Policy is to set out the Group’s commitment to ethics and legal compliance, to describe the elements of our ethics and compliance programme, and to define the responsibilities of those who work for and with the Group. It provides the overarching framework that connects our Code of Conduct and our specific compliance policies.

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 — through our codes of conduct — to the suppliers, subcontractors, consultants, agents and partners who act for or with us.

4. Our Ethical Principles

Our ethics and compliance programme is built on a small number of principles that guide how we act:

- **Integrity** — we are honest and do what we say we will do.
- **Compliance** — we obey the law and our own standards, and never treat commercial pressure as a reason to cut corners.
- **Fairness** — we compete fairly and treat people fairly.
- **Accountability** — we take responsibility for our decisions and their consequences.
- **Transparency** — we are open, keep accurate records, and speak up when something is wrong.

The detailed behaviour we expect of individuals is set out in our Code of Conduct and Business Ethics.

5. Our Commitment to Compliance

We comply with all laws and regulations applicable to our business. Our principal compliance areas, and the policies and legal frameworks that address them, include:

- **Anti-bribery and anti-corruption** — the UK Bribery Act 2010; in Kosovo, the Criminal Code No. 06/L-074 and Law No. 08/L-017 on the Agency for Prevention of Corruption — addressed by our Anti-Bribery and Anti-Corruption Policy.
- **Fair competition** — the UK Competition Act 1998 and Enterprise Act 2002; in Kosovo, Law No. 08/L-056 on the Protection of Competition — we compete on merit and do not engage in anti-competitive agreements or the abuse of a dominant position.
- **Anti-money laundering** — the UK Proceeds of Crime Act 2002 and the Money Laundering Regulations; in Kosovo, Law No. 05/L-096 on the Prevention of Money Laundering and Combating Terrorist Financing — we take steps to prevent our business being used to launder money or finance terrorism.
- **Sanctions and trade controls** — we comply with applicable international sanctions and export-control requirements.
- **Data protection** — the UK GDPR and Data Protection Act 2018 (as amended); in Kosovo, Law No. 06/L-082 — addressed by our Data Protection and Privacy Policy.
- **Human rights, modern slavery and labour standards** — addressed by our Human Rights Policy and Modern Slavery Policy.
- **Health, safety and the environment** — addressed by our health and safety and sustainability policies.
- **Conflicts of interest, gifts and hospitality** — addressed by our Code of Conduct and Anti-Bribery and Anti-Corruption Policy.

6. Our Ethics and Compliance Framework

We manage ethics and compliance through a structured programme with the following elements:

- **Leadership and culture** — management sets a clear tone from the top and fosters a culture in which doing the right thing is expected and supported.
- **Risk assessment** — we identify and assess our ethics and compliance risks, and focus our efforts where risk is greatest.
- **Policies and procedures** — we maintain a clear, accessible framework of policies, kept current and communicated to those who need them.
- **Due diligence** — we apply risk-based due diligence to the third parties we engage.
- **Training and communication** — we help our people understand their obligations through training and regular communication.
- **Advice and guidance** — people can seek guidance when they are unsure what to do.
- **Speaking up** — safe and confidential channels allow concerns to be raised and acted upon.
- **Monitoring, investigation and enforcement** — we monitor compliance, investigate concerns fairly, and take appropriate action.
- **Continual improvement** — we learn from what we find and strengthen the programme over time.

7. Governance, Roles and Responsibilities

- **The Board** provides oversight of the ethics and compliance programme, sets the tone, and approves this Policy.
- **The Group CEO** is accountable for the programme and leads by example.
- **Executive management and the compliance function** own and operate the programme, maintain the policy framework, coordinate risk assessment, training and monitoring, and advise the business. The Group designates a nominated ethics and compliance contact for this purpose.
- **Line managers** embed the programme in their areas, lead by example, and escalate concerns.
- **All personnel** must comply with the law and Group policies, complete required training, and speak up about wrongdoing.
- **Third parties** acting for or with the Group are expected to meet equivalent standards, as set out in our codes of conduct.

8. Speaking Up and Non-Retaliation

We encourage everyone to speak up about actual or suspected wrongdoing, and we make it safe to do so. Concerns may be raised with a line manager, with the nominated ethics and compliance contact, or in confidence — including anonymously — through the Group's dedicated channel at ethics@contech.biz. We do not tolerate retaliation against anyone who raises a concern in good faith. Speaking up is explained more fully in our Whistleblowing Policy.

9. Monitoring, Investigations and Enforcement

We monitor and review compliance with this Policy and the wider policy framework, and we investigate reports of possible wrongdoing fairly, promptly and confidentially. Where wrongdoing is found, we take appropriate action. For employees, breaches may result in disciplinary action up to and including dismissal; for third parties, they may result in corrective action and, where appropriate, termination of the engagement. Where conduct may involve a criminal offence, it may be reported to the competent authorities.

10. Related Policies

This Policy sits at the head of the Group's ethics and compliance framework and should be read together with the Group's other policies, including:

- the Code of Conduct and Business Ethics;
- the Anti-Bribery and Anti-Corruption Policy;
- the Whistleblowing Policy;
- the Human Rights Policy and the Modern Slavery Policy;
- the Data Protection and Privacy Policy and the Cookie Policy;
- the Diversity, Equity & Inclusion and Equal Opportunity Policy;
- the Sustainability and Environmental Protection Policy, and the health and safety policies; and
- the Supplier Code of Conduct and the Subcontractor Code of Conduct.

11. 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 the continual improvement of our ethics and compliance programme. This Policy 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 ethics and compliance contact or to info@contech.biz. Concerns may be reported in confidence to ethics@contech.biz.

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