



GROUP GOVERNANCE & OPERATIONS

Health and Safety Policy

CONTECH Group

Protecting the health, safety and wellbeing of everyone affected by our work

Document Control	
Document title	Health and Safety Policy
Owner / Group entity	CONTECH Group (CONTECH GROUP Ltd, UK and CONTECH GROUP sh.p.k., Kosovo)
Policy owner	Group Executive Management (overseen by the Group CEO)
Approved by	Gazmend Kelmendi, Group Chief Executive Officer, on behalf of the Board
Classification	Public
Version	1.0
Effective date	11 May 2026
Next review	15 April 2027

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1. Statement of Intent

CONTECH Group (“CONTECH”, “the Group”, “we”) regards the health, safety and welfare of its people — and of everyone affected by its work — as a core value and a fundamental responsibility. It is not something we trade off against cost or programme. Our goal is straightforward: everyone who works on, or visits, our projects goes home safe and well.

We are committed, so far as is reasonably practicable, to providing and maintaining safe places of work, plant, equipment and systems of work; to assessing and controlling the risks arising from our activities; to providing the information, instruction, training and supervision our people need; to consulting our workforce on health and safety; to complying fully with health and safety law; and to continually improving our performance. This commitment is led from the top of the Group and supported by the resources needed to deliver it.

Our health and safety commitments

- provide and maintain safe workplaces, plant and safe systems of work;
- assess and control risks to prevent injury and ill health;
- ensure our people are competent, informed, trained and properly supervised;
- consult our workforce and build a positive, proactive safety culture;
- protect not only our workers but also subcontractors, visitors and the public affected by our work; and
- **comply with the law, learn from incidents, and continually improve — so that everyone goes home safe.**

2. Purpose

This Policy sets out the Group’s commitment to health and safety, how responsibilities are organised, and the arrangements we have in place to manage health and safety across our offices, projects and sites. It provides the framework within which more detailed, site-specific and task-specific health and safety documents are prepared.

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 work activities.

It applies to all directors, officers, employees and workers, and sets requirements for the subcontractors, contractors, consultants and visitors who work on or attend our sites.

4. Our Health and Safety Commitments

Our approach is preventive: we seek to design out and control hazards at source, and we treat health with the same seriousness as safety. We believe that all injuries and work-related ill health are preventable, that everyone has a role to play, and that no task is so urgent or important that it cannot be done safely. We empower our people to stop any work they reasonably believe to be unsafe.

5. Legal Framework

5.1 United Kingdom

The Health and Safety at Work etc. Act 1974, which places general duties on employers to ensure, so far as is reasonably practicable, the health, safety and welfare of their employees and of others affected by their work, and requires a written health and safety policy. Supporting regulations include the Management of Health and Safety at Work Regulations 1999, the Construction (Design and Management) Regulations 2015, the Work at Height

Regulations 2005, the Provision and Use of Work Equipment Regulations 1998, the Lifting Operations and Lifting Equipment Regulations 1998, the Control of Substances Hazardous to Health Regulations 2002, and the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. The regulator is the Health and Safety Executive (HSE).

5.2 Kosovo

Law No. 04/L-161 on Safety and Health at Work, together with Law No. 03/L-212 on Labour and applicable secondary legislation. Enforcement is carried out by the Labour Inspectorate, which may order the stoppage of work where conditions pose a serious threat to health and safety. Where we operate elsewhere in the Western Balkans, we comply with applicable local law.

5.3 International standards

We have regard to the ILO Occupational Safety and Health Convention 1981 (No. 155) and the Promotional Framework for Occupational Safety and Health Convention 2006 (No. 187), and to the ISO 45001 approach to occupational health and safety management.

6. Organisation and Responsibilities

- **The Board and Group CEO** hold ultimate responsibility for health and safety, set the policy and the safety culture, and ensure adequate resources are provided.
- **Executive management** implement this Policy, ensure competent health and safety advice is available, and monitor performance across the Group.
- **Project and site managers** are responsible for health and safety on their projects and sites — implementing risk controls, safe systems of work, inductions and site rules, and acting promptly on hazards.
- **Supervisors** ensure that work in their teams is carried out safely and in accordance with safe systems of work.
- **The competent health and safety adviser** (internal or external) provides expert advice, supports risk assessment, and helps monitor compliance.
- **Employees and workers** must take reasonable care of their own and others' health and safety, follow safe systems of work and instructions, use equipment and protective equipment properly, and report hazards, near-misses and incidents.
- **Subcontractors, contractors and visitors** must comply with our health and safety requirements while on our sites.

7. Our Arrangements for Managing Health and Safety

We manage health and safety through arrangements that include:

- risk assessments and method statements, and safe systems of work supported, where needed, by permits to work;
- construction phase planning and coordination under the CDM framework;
- site set-up, access control, traffic management, welfare facilities and good housekeeping;
- safe selection, use, inspection and maintenance of plant, equipment and lifting operations;
- controls for work at height, excavations and temporary works;
- management of hazardous substances, dust, noise and vibration, and the provision and use of personal protective equipment (PPE);
- fire prevention and emergency arrangements;
- occupational health and wellbeing support;
- accident and incident reporting and investigation; and
- consultation with the workforce, and monitoring, inspection and audit.

8. Risk Assessment and Safe Systems of Work

We identify hazards and assess risks before work begins, and we control them using the hierarchy of control — eliminating hazards where we can, then reducing, isolating and controlling risks, with personal protective equipment as the last line of defence. Work is carried out under safe systems of work, supported by method statements, and higher-risk activities are controlled by permits to work. Risk assessments are reviewed when circumstances change or when an incident indicates they should be.

9. Construction Sites and CDM

On our projects we apply the duties under the Construction (Design and Management) Regulations 2015 and equivalent local requirements, cooperating with clients, principal designers and other duty holders. We prepare and implement construction phase plans, manage site access, welfare and traffic, and coordinate the health and safety of everyone on site, including subcontractors. Particular attention is given to the high-risk activities common in construction — including work at height, excavations, lifting operations, temporary works, plant and vehicle movements, and hazardous substances.

10. Competence, Induction and Training

We ensure that those who carry out work are competent to do so. Everyone receives a health and safety induction before starting on a site, and we provide the training, information and instruction that people need for their roles, including task-specific and refresher training. We verify the competence and certification of our workers and subcontractors where required for the work.

11. Occupational Health and Wellbeing

We manage risks to health as well as to safety, including exposure to dust, noise, vibration, manual handling and hazardous substances, and we provide health surveillance where appropriate. We also recognise the importance of mental health and wellbeing, and we seek to support our people and to foster a supportive working environment.

12. Consultation and Worker Involvement

We consult our workforce on matters affecting their health and safety, encourage workers to raise concerns and suggestions, and support their involvement in improving safety. Any worker may stop, and is expected to stop, work that they reasonably believe to be unsafe, without fear of penalty.

13. Incident Reporting and Investigation

All accidents, injuries, cases of work-related ill health, dangerous occurrences and near-misses must be reported promptly. We record and investigate incidents to establish their causes and to prevent recurrence, and we report to the relevant authorities where required — in the United Kingdom to the Health and Safety Executive under RIDDOR, and in Kosovo to the Labour Inspectorate. Lessons learned are shared across the Group.

14. Managing Contractors, Subcontractors and Visitors

We take account of health and safety competence when selecting subcontractors and contractors, set clear health and safety requirements for work on our sites, and monitor performance against them, as reflected in our Subcontractor Code of Conduct. Visitors are inducted, informed of site risks and rules, and supervised as appropriate.

15. Monitoring, Audit and Review

We monitor health and safety performance through inspections, audits, and the review of incidents and near-misses, using both leading indicators (such as inspections and training completed) and lagging indicators (such as incident rates). We set objectives, track our performance, and use what we learn to drive continual improvement.

16. Breaches, Governance and Review

Health and safety is a responsibility shared by everyone. Breaches of this Policy or of safety rules may result in disciplinary action up to and including dismissal and, for contractors and subcontractors, removal from site and termination of the engagement. Health and safety offences can also carry serious legal consequences for the Group and for individuals.

This Policy is issued and 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 Sustainability and Environmental Protection Policy, Human Rights Policy, Ethics and Compliance Policy, and the Supplier and Subcontractor Codes of Conduct, and with the site-specific and task-specific health and safety documents prepared for each project. It will be reviewed at least annually, and sooner following any significant incident or any change in law, activity or organisation.

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**. Health and safety concerns may also be reported in confidence to **ethics@contech.biz**.

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