



GROUP GOVERNANCE & SUSTAINABILITY

Human Rights Policy

CONTECH Group

Respecting the human rights of our people, our supply chain and the communities where we build

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1. Policy Statement

CONTECH Group (“CONTECH”, “the Group”, “we”) is committed to respecting human rights across all our operations and business relationships. We recognise our responsibility to respect the human rights of everyone affected by our activities — our employees and workers, the workers in our supply chain, and the communities in and around the places where we build.

Our approach is guided by the UN Guiding Principles on Business and Human Rights. We seek to avoid causing or contributing to adverse human rights impacts through our own activities, to address any such impacts if they occur, and to use our influence to prevent or mitigate impacts that are directly linked to our operations, works or services through our business relationships.

In practice, we commit to:

- respect the human rights of our workers, our supply chain and the communities affected by our work;
- never use or tolerate forced labour, modern slavery, human trafficking or child labour;
- provide safe, fair and non-discriminatory working conditions;
- carry out human rights due diligence and act on what we find; and
- **provide accessible ways to raise concerns, and remedy adverse impacts we cause or contribute to.**

2. Purpose

This Policy sets out our commitment to respecting human rights, the standards that guide us, our principal commitments, and how we seek to identify, prevent, mitigate and remedy adverse human rights impacts connected with our business.

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.

It also informs our relationships with suppliers, subcontractors, consultants, agents, joint-venture partners and clients, whom we expect to respect human rights consistent with this Policy.

4. Standards We Respect

We respect internationally recognised human rights, understood at a minimum as those expressed in:

- the International Bill of Human Rights — the Universal Declaration of Human Rights and the two International Covenants (on Civil and Political Rights, and on Economic, Social and Cultural Rights);
- the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work and its fundamental Conventions — covering freedom of association and collective bargaining, the elimination of forced and compulsory labour, the abolition of child labour, and the elimination of discrimination in employment;
- the UN Guiding Principles on Business and Human Rights;
- the OECD Guidelines for Multinational Enterprises; and
- the Ten Principles of the UN Global Compact.

5. Legal Framework

5.1 United Kingdom

The Human Rights Act 1998, which gives effect to the European Convention on Human Rights; the Modern Slavery Act 2015; the Equality Act 2010; the Health and Safety at Work etc. Act 1974; and related employment legislation.

5.2 Kosovo and the Western Balkans

The Constitution of the Republic of Kosovo directly incorporates, and gives priority over conflicting law to, core international human rights instruments (Article 22), including the Universal Declaration of Human Rights, the European Convention on Human Rights and the International Covenant on Civil and Political Rights, and it prohibits discrimination (Article 24). Supporting legislation includes Law No. 04/L-218 on Preventing and Combating Trafficking in Human Beings, 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, Law No. 05/L-020 on Gender Equality, and Law No. 06/L-085 on the Protection of Whistleblowers. Where we operate elsewhere in the Western Balkans, we comply with applicable local law.

5.3 International standards

The standards set out in Section 4 above, which inform our approach in every jurisdiction. Where local law and these standards differ, we seek to honour both; where they conflict, we honour the higher standard and comply with local law while seeking ways to respect international human rights principles.

6. Our Human Rights Commitments

We are committed, in our own operations and in our expectations of those we work with, to the following.

- **Freedom from forced labour and modern slavery** — we do not use or tolerate forced, bonded or involuntary labour, human trafficking or modern slavery. We do not charge workers recruitment fees, and we do not retain workers' identity or travel documents.
- **No child labour** — we do not employ any person below the minimum working age permitted under applicable law and the relevant ILO conventions, and we protect young workers from hazardous work.
- **Fair working conditions** — we pay at least the legal minimum wage and required benefits, and comply with working-time and rest-period requirements.
- **Freedom of association** — we respect the right of workers to associate freely and to bargain collectively in accordance with applicable law.
- **Non-discrimination and equal treatment** — we treat people fairly and do not discriminate on the basis of any characteristic protected by applicable law, as set out in our Diversity, Equity & Inclusion and Equal Opportunity Policy.
- **Health, safety and wellbeing** — we protect the health and safety of our workers and of those affected by our activities, and no one is penalised for stopping unsafe work.
- **Humane treatment** — we provide a workplace free from harassment, bullying, physical or verbal abuse, and any inhumane or degrading treatment.
- **Responsible recruitment** — we recruit responsibly and take particular care in relation to migrant and agency workers, who can be more vulnerable to exploitation.
- **Privacy** — we respect privacy and protect personal data in accordance with applicable data-protection law.

7. Human Rights Due Diligence

Consistent with the UN Guiding Principles, we seek to manage our human rights impacts through ongoing due diligence. This means we aim to:

- identify and assess the actual and potential human rights impacts of our activities and business relationships;

- integrate the findings and take appropriate action to prevent and mitigate adverse impacts;
- track whether our response is effective; and
- be prepared to communicate how we address our impacts.

We give particular attention to the human rights issues most salient to our sector and to groups who may be more vulnerable to harm.

8. Business Relationships and the Value Chain

We expect our suppliers, subcontractors, consultants, agents and joint-venture partners to respect human rights consistent with this Policy, as reflected in our Supplier Code of Conduct and Subcontractor Code of Conduct. We use the leverage available to us to encourage respect for human rights in our value chain, and where a partner is unwilling to meet these standards, we will reconsider the relationship.

9. Community, Land and Project Impacts

Engineering and construction activities can affect the people and communities around our projects. We seek to identify and manage the human rights impacts of our works, including those relating to land and property and, where relevant, resettlement; access to water and a healthy environment; the health and safety of the public; and the conduct of any security personnel engaged for our sites, who must act consistently with human rights. We engage constructively with affected communities and seek to avoid, minimise and remedy adverse impacts.

10. Grievance Mechanisms and Access to Remedy

We provide accessible ways for people — including workers, communities and other affected parties — to raise human rights concerns, and we handle them fairly and, so far as possible, confidentially. Concerns may be raised through the Group's channels, including in confidence at ethics@contech.biz. We do not tolerate retaliation against anyone who raises a concern in good faith. Where we identify that we have caused or contributed to an adverse human rights impact, we will provide for, or cooperate in, legitimate remediation.

11. Roles and Responsibilities

- **The Board and Group CEO** provide leadership and accountability for respecting human rights, and approve this Policy.
- **Executive management** embed this Policy into the Group's processes, ensure due diligence and grievance arrangements are in place, and allocate the necessary resources.
- **Line managers** apply this Policy in their areas and oversee the third parties they engage.
- **All personnel** treat others with dignity and respect and report concerns.
- **Business partners** are expected to respect human rights consistent with this Policy.

12. Training, Communication, Monitoring and Reporting

We communicate this Policy to our people and, where appropriate, to our business partners, and we provide guidance and training relevant to people's roles. We monitor the effectiveness of our approach and support transparency, including through the Group's modern slavery reporting and wider sustainability disclosures.

13. Breaches and Consequences

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 remediation requirements and, where appropriate, suspension or termination of the relationship. Certain conduct — including forced labour, human trafficking and modern slavery — is also a criminal offence and may be referred to the competent authorities.

14. Governance, Related Documents and Review

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 Code of Conduct and Business Ethics, the Diversity, Equity & Inclusion and Equal Opportunity Policy, the Anti-Bribery and Anti-Corruption Policy, the Modern Slavery Statement, the Supplier and Subcontractor Codes of Conduct, the Health and Safety policies, and the Whistleblowing Policy. It 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 Group Executive Management or to **info@contech.biz**. Concerns may be reported in confidence to **ethics@contech.biz**.

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