



GROUP GOVERNANCE & SUSTAINABILITY

Modern Slavery Policy

CONTECH Group

Preventing modern slavery and human trafficking in our operations and supply chains

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1. Policy Statement

CONTECH Group (“CONTECH”, “the Group”, “we”) has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity, and to putting in place effective systems and controls so that modern slavery is not taking place anywhere in our own operations or in our supply chains.

We recognise that the construction and infrastructure sector — with its reliance on labour, extensive subcontracting and, at times, migrant workers — can carry a heightened risk of modern slavery. We take our responsibility to prevent it seriously, and we expect the same commitment from everyone who works with us.

Our commitment at a glance

- We never use or tolerate forced, bonded or compulsory labour, human trafficking, servitude or child labour.
- We expect the same standard from every supplier, subcontractor and business partner, and throughout their supply chains.
- We never charge workers recruitment fees or retain their identity or travel documents.
- We carry out risk-based due diligence across our operations and supply chain.
- **Where modern slavery is identified, our priority is the safety of affected workers, and we act to remediate it.**

2. Purpose

This Policy sets out our commitment to preventing modern slavery, defines what it covers, and explains the standards, controls and responsibilities that apply across the Group and to those we do business with. It supports the Group’s wider Human Rights Policy and Code of Conduct.

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 sets our expectations of suppliers, subcontractors, consultants, agents, labour providers and joint-venture partners, who must prevent modern slavery in their own operations and supply chains.

4. What We Mean by Modern Slavery

“Modern slavery” is an umbrella term for serious exploitation in which one person deprives another of their liberty for gain. It includes:

- **Slavery and servitude** — the exercise of powers of ownership over a person, or an obligation to provide services imposed by coercion.
- **Forced or compulsory labour** — work or service exacted from a person under the menace of a penalty and which the person has not offered voluntarily.
- **Debt bondage** — where a person’s labour is demanded as a means of repaying a debt, often on unfair terms.
- **Human trafficking** — the recruitment, movement, harbouring or receipt of a person, by coercion or deception, for the purpose of exploitation.
- **Child labour** — work that is harmful to children or that is performed below the minimum working age.

5. Legal Framework

5.1 United Kingdom

The Modern Slavery Act 2015 creates offences of slavery, servitude and forced or compulsory labour (section 1) and human trafficking (section 2), and requires larger commercial organisations to publish an annual slavery and human trafficking statement (section 54). The Human Rights Act 1998 gives effect to Article 4 of the European Convention on Human Rights, which prohibits slavery and forced labour.

5.2 Kosovo

Law No. 04/L-218 on Preventing and Combating Trafficking in Human Beings and Protecting Victims of Trafficking, and the Criminal Code No. 06/L-074, criminalise trafficking and related exploitation. Law No. 03/L-212 on Labour and the Constitution of the Republic of Kosovo — which incorporates the prohibition of slavery and forced labour through Article 22 — provide further protection.

5.3 International standards

The ILO Forced Labour Convention 1930 (No. 29) and its 2014 Protocol, the Abolition of Forced Labour Convention 1957 (No. 105), the Worst Forms of Child Labour Convention 1999 (No. 182) and the Minimum Age Convention 1973 (No. 138); the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons (the “Palermo Protocol”); the UN Guiding Principles on Business and Human Rights; and the UN Global Compact.

6. Our Commitments

- **No forced labour or trafficking** — we prohibit forced, bonded, indentured or involuntary labour, servitude and human trafficking in every form.
- **No child labour** — we do not employ anyone below the minimum working age permitted under applicable law and the relevant ILO conventions, and we protect young workers from hazardous work.
- **Responsible recruitment** — we do not charge workers recruitment fees, we do not retain identity or travel documents, and we respect workers’ freedom of movement.
- **Right to work and fair terms** — we verify workers’ legal right to work, pay at least the legal minimum wage, and comply with working-time and rest requirements.
- **Freedom to leave** — workers are free to end their employment after reasonable notice, without penalty.

7. Where the Risks Arise

We give particular attention to the areas of our business where modern slavery risk is higher, including:

- lower-tier, labour-only and agency or temporary labour arrangements;
- migrant and other vulnerable workers, who may face language, immigration or debt-related pressures;
- labour-intensive trades and site activities, and rapid mobilisation on large projects; and
- the sourcing of materials and products, particularly from higher-risk regions or sectors.

8. Due Diligence and Risk Management

We manage modern slavery risk through proportionate, risk-based due diligence. We:

- assess modern slavery risk across our operations and supply chain, and prioritise higher-risk relationships and activities;
- include modern slavery and responsible-recruitment obligations, and audit and termination rights, in our contracts;
- carry out proportionate checks on suppliers, subcontractors and labour providers, including their own labour practices;

- provide accessible ways for workers to raise concerns; and
- act on what we find, including requiring corrective action.

9. Our Supply Chain and Business Partners

We expect all suppliers, subcontractors, consultants, agents, labour providers and joint-venture partners to prohibit modern slavery and to require equivalent standards throughout their own supply chains, as reflected in our Supplier Code of Conduct and Subcontractor Code of Conduct. Where a partner is unwilling or unable to meet these standards, we will require improvement and, if necessary, end the relationship — while remaining mindful that abruptly ending an engagement can sometimes worsen outcomes for affected workers, so we favour remediation where that better protects them.

10. Recognising the Signs of Modern Slavery

The following may indicate that a person is a victim of modern slavery. They are not conclusive, but they call for concern and, where appropriate, escalation:

- a worker appears to be under the control of another person, or is not free to leave or to change employer;
- a third party holds a worker's identity or travel documents;
- a worker shows signs of fear, distress, untreated injury, malnourishment or very poor living conditions;
- several workers are paid into the same bank account, or wages are withheld, unexplained or subject to deductions;
- a labour provider is reluctant to provide workers' details, contracts or evidence of right to work; or
- workers appear unaware of their terms, owe recruitment debts, or cannot access their own pay.

11. Reporting Concerns and Remediation

Anyone who suspects that modern slavery may be taking place in connection with the Group must report it. Concerns may be raised through the Group's channels, including in confidence at ethics@contech.biz. Where a person is in immediate danger, contact the police or emergency services first. We do not tolerate retaliation against anyone who raises a concern in good faith. Where modern slavery is identified, the safety and support of affected workers is our first priority, and we will take steps to remediate the harm and to cooperate with the competent authorities.

12. Roles and Responsibilities

- **The Board and Group CEO** provide leadership and accountability, and approve this Policy and any statutory statement.
- **Executive management** embed this Policy into procurement and operations, ensure due diligence and reporting arrangements are in place, and allocate resources.
- **Line managers** apply this Policy, oversee the labour providers and subcontractors they engage, and escalate concerns.
- **All personnel** remain alert to the signs of modern slavery and report concerns.
- **Business partners** are expected to meet the standards in this Policy.

13. Training and Awareness

We provide risk-based awareness and training so that our people — particularly those involved in recruitment, procurement and site management — can recognise the signs of modern slavery and know how to respond and report.

14. Monitoring, Reporting and Our Modern Slavery Statement

We monitor the effectiveness of our approach and seek to improve it. Where required by law, or where we consider it appropriate, the Group publishes an annual modern slavery and human trafficking statement, approved by the Board, describing the steps taken during the year to prevent modern slavery in our operations and supply chains.

15. 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 remediation requirements and, where appropriate, suspension or termination of the relationship. Modern slavery and human trafficking are also criminal offences and 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 Human Rights Policy, the Code of Conduct and Business Ethics, the Supplier and Subcontractor Codes of Conduct, the Whistleblowing Policy and the health and safety policies. 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

Concerns may be reported in confidence to ethics@contech.biz. General questions about this Policy may be directed to Group Executive Management or to info@contech.biz.

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