



PROJECT DELIVERY & SUPPLY CHAIN

Subcontractor Code of Conduct

CONTECH Group

The standards we require of subcontractors performing works on CONTECH projects and sites

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1. Introduction and Purpose

CONTECH Group (“CONTECH”, “the Group”, “we”) is an international engineering, construction and infrastructure organisation. Much of what we build is delivered with the help of subcontractors who perform works on our projects and sites. The safety, quality and reputation of every project depend on those subcontractors working to the same high standards we set for ourselves.

This Subcontractor Code of Conduct (“this Code”) sets out the minimum standards we require of subcontractors and their workers. It complements our Supplier Code of Conduct — which applies to the supply of goods and services generally — by addressing the specific responsibilities that arise when working on a CONTECH site.

2. Scope and Application

In this Code, “Subcontractor” means any party engaged by the Group to carry out works, together with its personnel, labour and any sub-subcontractors it uses on a CONTECH project or site.

This Code applies to all Subcontractors and all works performed for the Group. It sets minimum standards and applies in addition to a Subcontractor’s legal obligations and to the terms of any subcontract, contract or order with the Group. Where a subcontract or applicable law imposes a stricter requirement, that stricter requirement applies. Nothing in this Code overrides applicable law or a signed subcontract, and CONTECH may incorporate this Code into its subcontracts and orders.

3. General Principle — Compliance with Law and this Code

Subcontractors must comply with all applicable laws, regulations and standards in every jurisdiction in which they work, and with this Code. The principal legal frameworks relevant to the Group’s operations include:

- **United Kingdom** — the Health and Safety at Work etc. Act 1974 and the Construction (Design and Management) Regulations 2015, the Bribery Act 2010, the Modern Slavery Act 2015, the Competition Act 1998 and Enterprise Act 2002, the Equality Act 2010, the Proceeds of Crime Act 2002 and the Money Laundering Regulations, and UK data protection legislation (UK GDPR and the Data Protection Act 2018).
- **Kosovo and the Western Balkans** — Law No. 04/L-161 on Safety and Health at Work, the Criminal Code No. 06/L-074, Law No. 08/L-017 on the Agency for Prevention of Corruption, Law No. 08/L-056 on the Protection of Competition, Law No. 05/L-096 on the Prevention of Money Laundering and Combating Terrorist Financing, Law No. 06/L-085 on the Protection of Whistleblowers, Law No. 03/L-212 on Labour, Law No. 05/L-021 on the Protection from Discrimination, Law No. 05/L-020 on Gender Equality, and the Law on Personal Data Protection; together with the applicable local law of any other Western Balkans jurisdiction concerned.
- **International standards** — the fundamental Conventions of the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

4. Health, Safety and Welfare on Site

Nothing we build is worth an injury. Health and safety is the first priority on every CONTECH site, and Subcontractors carry primary responsibility for the safety of their own works and workers.

- Comply fully with all applicable health and safety law and with CONTECH’s site rules, site induction, method statements and risk assessments (RAMS), and permit-to-work systems.
- Ensure that every worker is competent, adequately trained, medically fit and holds the qualifications, certifications or trade cards required for their work.
- Provide, maintain and enforce the use of appropriate personal protective equipment, and ensure that plant, tools and equipment are safe, inspected and hold valid certification.
- Do not carry out high-risk activities — including work at height, excavation, lifting operations, hot works, confined-space entry and work near live services — without the required permits, controls and supervision.

- Report all accidents, incidents, near-misses, dangerous occurrences and hazards promptly, and cooperate fully with any investigation.
- Empower every worker to stop work that cannot be carried out safely. No one will be penalised for stopping unsafe work.
- Observe the welfare, hygiene and site-security arrangements in place, and never work under the influence of alcohol or unauthorised drugs.

5. Workforce and Labour on Site

Subcontractors must respect internationally recognised human rights and meet the following minimum labour standards for everyone they deploy on our sites.

- **Right to work** — verify and be able to evidence that every worker has the legal right to work under applicable immigration and labour law. Undeclared, illegal or unauthorised labour is prohibited.
- **No forced or child labour** — do not use forced, bonded or involuntary labour, human trafficking or modern slavery, and do not employ any person below the minimum working age permitted under applicable law and the relevant ILO conventions.
- **Fair wages and hours** — pay at least the legal minimum wage, provide legally required benefits, and comply with working-time and rest-period requirements. Respect freedom of association in accordance with applicable law.
- **Humane treatment and equal opportunity** — provide a workplace free from harassment, bullying, abuse and intimidation, and do not discriminate on the basis of any characteristic protected by applicable law.
- **Conduct on site** — treat CONTECH personnel, other trades, the client, visitors and the public with respect, and follow all behaviour and security requirements while on site.

6. Quality and Workmanship

- Carry out the works in accordance with the specification, drawings, applicable standards and good industry practice, and do not compromise quality or safety to save time or cost.
- Ensure the authenticity, compliance and traceability of materials and products used, and do not incorporate counterfeit, substandard or misrepresented materials.
- Cooperate with inspection, testing and quality assurance, and rectify defects and snags promptly at your own cost where you are responsible.

7. Programme, Coordination and Care of the Works

- Plan and resource the works to meet the agreed programme, coordinate with CONTECH and other trades, and attend required site and progress meetings.
- Maintain good housekeeping, protect the works, materials and plant from damage and loss, and observe site-security requirements.
- Take care not to damage existing structures, services or third-party property, and reinstate promptly where you cause damage.

8. Environmental Management on Site

- Comply with applicable environmental law, permits and consents, and with CONTECH's environmental controls for the site.
- Control dust, noise, vibration and run-off, prevent spills and pollution, and store and handle hazardous substances safely.
- Minimise, segregate and lawfully dispose of waste, use resources efficiently, and be considerate towards neighbours and the surrounding environment.

9. Business Ethics and Integrity

- **Anti-bribery and corruption** — do not offer, give, request or accept any bribe or improper advantage, directly or indirectly, and do not offer improper gifts, hospitality or inducements to CONTECH personnel. Cash or cash-equivalent gifts are never acceptable, and facilitation payments are prohibited.
- **Conflicts of interest** — disclose any actual, potential or perceived conflict of interest, including any personal or family relationship with CONTECH personnel involved in the engagement.
- **Fair competition** — compete fairly and do not engage in bid-rigging, price-fixing, market-sharing or the improper exchange of competitively sensitive information.
- **Financial integrity** — do not facilitate money laundering or the financing of terrorism, comply with applicable sanctions, keep accurate and complete records, and do not engage in fraud or falsification.

10. Confidentiality, Data Protection and Information Security

- Protect the confidential information and intellectual property of the Group and of third parties, and use it only for the agreed purposes.
- Where you process personal data on behalf of the Group, do so lawfully, fairly and securely and only as instructed, in accordance with the Kosovo Law on Personal Data Protection and, for the United Kingdom, UK data protection legislation (UK GDPR and the Data Protection Act 2018).
- Maintain appropriate information-security measures and notify the Group promptly of any actual or suspected data or security breach affecting Group information.

11. Insurance, Records and Further Subcontracting

- Hold and maintain the insurances required under the subcontract — including as applicable employers' liability, public liability and works insurance — and provide evidence on request.
- Keep accurate site, labour, safety, quality and environmental records, and make them available to CONTECH on reasonable request.
- Do not further subcontract the works, in whole or in part, without CONTECH's prior written consent. Where consent is given, communicate this Code to any permitted sub-subcontractor, require equivalent standards, and remain fully responsible for their compliance.

12. Monitoring, Verification and Audit

CONTECH may monitor and verify compliance with this Code. On reasonable notice, and subject to confidentiality and applicable law, this may include site inspections, safety and quality audits, requests for information and evidence, and reviews of records — directly or through an appointed representative. Subcontractors must cooperate reasonably and provide accurate information.

13. Raising Concerns

Subcontractors and their workers are encouraged to report, in good faith, any concern about safety, conduct or compliance in connection with the Group. Concerns may be raised with CONTECH site management, with procurement@contech.biz, or in confidence to ethics@contech.biz. CONTECH does not tolerate retaliation against anyone who raises a concern in good faith.

14. Consequences of Non-Compliance

We treat compliance with this Code as an important part of our relationships with Subcontractors, and safety non-compliance is treated with particular seriousness. Where a Subcontractor does not meet these standards, CONTECH may require corrective action, remove workers or the Subcontractor from site, and, in the case of serious or persistent non-compliance, suspend or terminate the engagement, remove the Subcontractor from

approved lists, and refer matters to the competent authorities. These remedies are in addition to any rights under the relevant subcontract or applicable law.

15. Acceptance and Acknowledgement

By accepting orders from, or entering into or continuing a subcontract with, the Group, the Subcontractor acknowledges this Code and agrees to comply with it. Where requested, the Subcontractor will confirm its acceptance by signing below.

Subcontractor acceptance	
Subcontractor (company name)	
Company registration no.	
Authorised signatory	
Position	
Signature	
Date	

Issued on behalf of CONTECH Group

Name	Gazmend Kelmendi
Position	Group Chief Executive Officer
Date of issue	11 May 2026

Contact

Questions about this Code may be directed to **procurement@contech.biz**. Concerns may be reported in confidence to **ethics@contech.biz**.

CONTECH GROUP Ltd — 62 Camden Road, London NW1 9DR, United Kingdom

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