



PROCUREMENT & SUPPLY CHAIN

Supplier Code of Conduct

CONTECH Group

The standards we require of our suppliers, subcontractors and business partners

Document Control	
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1. Introduction and Purpose

CONTECH Group (“CONTECH”, “the Group”, “we”) is an international engineering, construction and infrastructure organisation. The quality, safety and integrity of what we deliver depend not only on our own people, but on the suppliers, subcontractors, consultants, agents and other business partners who work with us.

This Supplier Code of Conduct (“this Code”) sets out the minimum standards we require of those partners. It reflects the same principles that govern our own conduct under the CONTECH Code of Conduct and Business Ethics, and it is intended to help our partners understand what we expect and to build long-term, trusted relationships.

We select and retain partners not only on price, quality and capability, but also on their commitment to acting lawfully, safely and ethically.

2. Scope and Application

In this Code, “Supplier” means any supplier, subcontractor, consultant, agent, vendor or other third party that provides goods, works or services to the Group, together with its personnel.

This Code applies to all Suppliers and to all goods, works and services provided to the Group. Suppliers are expected to comply with it in full and to require equivalent standards throughout their own supply chains.

This Code sets minimum standards and applies in addition to a Supplier’s legal obligations and to the terms of any contract or purchase order with the Group. Where a contract or applicable law imposes a stricter requirement, that stricter requirement applies. Nothing in this Code overrides applicable law or a signed contract, and CONTECH may incorporate this Code into its contracts and purchase orders.

3. General Principle — Compliance with Law and this Code

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

- **United Kingdom** — the Bribery Act 2010, Modern Slavery Act 2015, Competition Act 1998 and Enterprise Act 2002, Health and Safety at Work etc. Act 1974, Equality Act 2010, 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** — 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. 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 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. Business Ethics and Integrity

4.1 Anti-bribery and corruption

Suppliers must not engage in any form of bribery or corruption. They must not offer, promise, give, request, agree to receive or accept any bribe or improper advantage, directly or through a third party, in connection with their dealings with the Group or with public officials.

4.2 Gifts, hospitality and inducements

Suppliers must not offer gifts, hospitality, payments or other inducements to CONTECH personnel that could improperly influence, or appear to influence, a business decision. Cash or cash-equivalent gifts must never be offered.

4.3 Facilitation payments

Suppliers must not make facilitation payments — small unofficial payments to secure or speed up routine actions — in connection with any goods, works or services provided to the Group.

4.4 Conflicts of interest

Suppliers must disclose to CONTECH any actual, potential or perceived conflict of interest that could affect their dealings with the Group, including any personal or family relationship with CONTECH personnel involved in the relationship.

4.5 Fair competition

Suppliers must compete fairly and comply with competition and antitrust law. They must not engage in bid-rigging, price-fixing, market-sharing or the improper exchange of competitively sensitive information.

4.6 Anti-money laundering and sanctions

Suppliers must not facilitate money laundering or the financing of terrorism, must ensure that funds and dealings are from legitimate sources, and must comply with applicable trade sanctions and export-control requirements.

4.7 Accurate records and transparency

Suppliers must keep accurate and complete business records, must not engage in fraud or falsification, and must provide the Group with honest and accurate information.

5. Labour and Human Rights

Suppliers must respect internationally recognised human rights and meet the following minimum labour standards.

- **No forced labour or modern slavery** — Suppliers must not use forced, bonded, indentured or involuntary labour, human trafficking or any form of modern slavery, and must not retain workers' identity documents or charge recruitment fees to workers.
- **No child labour** — Suppliers must not employ any person below the minimum working age permitted under applicable law and the relevant ILO conventions, and must not expose young workers to hazardous work.
- **Fair wages and working hours** — Suppliers must pay at least the legal minimum wage, provide any legally required benefits, and comply with applicable working-time and rest-period requirements.
- **Freedom of association** — Suppliers must respect workers' rights to freedom of association and collective bargaining in accordance with applicable law.
- **Humane treatment** — Suppliers must provide a workplace free from harassment, bullying, physical or verbal abuse, and any form of intimidation.
- **Non-discrimination** — Suppliers must not discriminate on the basis of any characteristic protected by applicable law, and must provide equal opportunity in employment.

6. Health, Safety and Welfare

Suppliers must protect the health, safety and welfare of their workers and of anyone affected by their activities.

- Provide a safe working environment and safe systems of work, and comply with all applicable health and safety law.
- When working on or for CONTECH sites and projects, comply fully with CONTECH's site rules, method statements and safety requirements, and hold the right to stop work that cannot be done safely.
- Ensure workers are competent and trained, provide appropriate personal protective equipment, and have arrangements for emergencies, incident reporting and welfare facilities.

7. Environment

Suppliers must manage the environmental impact of their activities responsibly.

- Comply with applicable environmental law, permits and consents.
- Use energy, water and materials efficiently, minimise and properly manage waste and emissions, and prevent pollution.
- Support the Group's wider environmental, social and governance (ESG) commitments and provide relevant environmental information on request.

8. Quality and Integrity of Goods and Services

- Provide goods, works and services that meet the agreed specifications and applicable technical, contractual and professional standards.
- Ensure the authenticity and traceability of materials and products, and do not supply counterfeit, substandard or misrepresented goods.
- Maintain appropriate quality-management arrangements and cooperate with reasonable inspection and testing.

9. 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 Suppliers 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.

10. Sub-tier Supply Chain

Suppliers must communicate the standards in this Code to their own employees, subcontractors and suppliers who contribute to goods, works or services provided to the Group, and must require them to meet equivalent standards. Suppliers remain responsible for compliance throughout their supply chain.

11. Monitoring, Verification and Audit

CONTECH may assess and verify compliance with this Code. On reasonable notice, and subject to confidentiality and applicable law, this may include self-assessment questionnaires, requests for information and evidence, and audits or site visits — directly or through an appointed representative. Suppliers must cooperate reasonably with such verification and provide accurate information.

12. Raising Concerns

Suppliers and their workers are encouraged to report, in good faith, any concern about conduct that may breach this Code or the law in connection with the Group. Concerns may be reported in confidence to **ethics@contech.biz**. Procurement-related queries may be directed to **procurement@contech.biz**. CONTECH does not tolerate retaliation against anyone who raises a concern in good faith.

13. Consequences of Non-Compliance

We treat compliance with this Code as an important part of our relationships with Suppliers. Where a Supplier does not meet these standards, CONTECH may require corrective action within a reasonable period. Serious or

persistent non-compliance, or a failure to remediate, may lead to suspension or termination of the relationship, removal from approved-supplier lists, and, where appropriate, referral to the competent authorities. These remedies are in addition to any rights under the relevant contract or applicable law.

14. Acceptance and Acknowledgement

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

Supplier acceptance	
Supplier (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**.

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