



GROUP GOVERNANCE & SUSTAINABILITY

Sustainability Policy

CONTECH Group

Our environmental, social and governance commitments — building responsibly for the long term

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1. Policy Statement

CONTECH Group (“CONTECH”, “the Group”, “we”) is committed to building responsibly and to creating lasting value — not only for our clients and our business, but for our people, the communities in which we work, and the environment. We believe a successful engineering, construction and infrastructure group must also be a sustainable one: safe, ethical, environmentally responsible, and a positive contributor to society.

This Policy sets out our approach to sustainability across the environmental, social and governance (ESG) dimensions of our business, and how we turn that commitment into action. It is guided by internationally recognised frameworks, including the UN Sustainable Development Goals.

Our sustainability commitments:

- Environmental — protect the environment, use resources responsibly, and reduce our carbon footprint towards net zero.
- Social — keep people safe and well, treat them fairly, respect human rights, and create positive value for our communities.
- Governance — act with integrity, transparency and strong compliance.
- **and to measure our performance, engage our stakeholders, and improve year on year.**

2. Purpose

This Policy explains our sustainability approach and our ESG commitments, how we govern and measure them, and how our specific policies deliver them. It provides the strategic framework that sits above the Group’s more detailed environmental, social and governance policies.

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 operations, projects and supply chain, and applies to all directors, officers, employees and workers.

It also informs how we work with our clients, suppliers, subcontractors and partners.

4. Our Approach to Sustainability

We address sustainability across three dimensions — environmental, social and governance — and we integrate it into how we make decisions, win and deliver work, and manage our business, rather than treating it as a separate activity. We focus our effort on the issues that matter most to our business and our stakeholders.

Our approach is guided by internationally recognised frameworks, including the UN Sustainable Development Goals, the Ten Principles of the UN Global Compact, and the Paris Agreement on climate change. Our aim is to grow our business while reducing our environmental impact and increasing our positive contribution to society.

5. Environmental Responsibility

We are committed to protecting the environment, using resources efficiently, and reducing our carbon footprint. We manage our environmental impacts through an environmental management system aligned with ISO 14001; we prevent pollution, apply the waste hierarchy, protect biodiversity, and seek to build more sustainably. We recognise the urgency of climate change and are committed to measuring and reducing our greenhouse gas emissions and supporting the transition towards a low-carbon, net zero future. Our detailed environmental commitments and controls are set out in our Environmental Policy.

6. Social Responsibility — Our People and Communities

Our people, and the communities around our projects, are central to our success.

- **Health, safety and wellbeing** — we protect the health, safety and wellbeing of everyone affected by our work (see our Health and Safety Policy).
- **A fair and inclusive workplace** — we treat people fairly, promote diversity, equity and inclusion, and help our people develop (see our Diversity, Equity & Inclusion and Equal Opportunity Policy).
- **Human rights and labour standards** — we respect human rights and prohibit modern slavery and child labour across our operations and supply chain (see our Human Rights and Modern Slavery Policies).
- **Communities and social value** — we seek to create positive social value where we build, supporting local employment, skills and suppliers, engaging respectfully with communities, and minimising disruption from our works.

7. Responsible Governance

Strong governance underpins our sustainability. We act with integrity and in compliance with the law; we maintain a zero-tolerance approach to bribery and corruption; we compete fairly; we protect personal data and privacy; we keep accurate records; and we provide safe channels for people to speak up. These commitments are set out in our Ethics and Compliance Policy, our Anti-Bribery and Anti-Corruption Policy, our Whistleblowing Policy, and our Data Protection and Privacy Policy. Sustainability is overseen at Board level and integrated into our governance and decision-making.

8. Sustainable and Responsible Supply Chain

A significant part of our impact — and of our opportunity — lies in our supply chain. We work with suppliers and subcontractors who share our values, we consider environmental and social criteria in procurement, and we set clear expectations through our Supplier Code of Conduct and Subcontractor Code of Conduct. We use our influence to encourage responsible practices, including on labour standards, human rights, health and safety, and the environment.

9. Stakeholder Engagement

We listen to and engage with our stakeholders — clients, employees and workers, suppliers, communities, authorities and partners — because understanding their priorities helps us build better and more sustainably, and manage our impacts responsibly. We seek to be open about our sustainability performance.

10. Governing, Measuring and Reporting Our Sustainability

Sustainability is led from the top and integrated into how we run the business. We set sustainability objectives and targets, measure our performance, and work to improve year on year. As our approach matures, we will report on our environmental, social and governance performance in a transparent way, in line with recognised frameworks and the expectations of our clients and stakeholders.

11. Related Policies

This Policy is the strategic framework above the Group's more detailed policies, which together deliver our sustainability commitments, including:

- the Environmental Policy;
- the Health and Safety Policy;
- the Diversity, Equity & Inclusion and Equal Opportunity Policy;
- the Human Rights Policy and the Modern Slavery Policy;
- the Ethics and Compliance Policy, the Anti-Bribery and Anti-Corruption Policy and the Whistleblowing Policy;
- the Data Protection and Privacy Policy; and
- the Supplier Code of Conduct and the Subcontractor Code of Conduct.

12. Governance, Review and Continual Improvement

This Policy is approved by the Group Chief Executive Officer on behalf of the Board and is owned by Group Executive Management. We are committed to the continual improvement of our sustainability performance. This Policy will be reviewed at least annually, and sooner if required by changes in our business, our stakeholders' expectations, or applicable law.

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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