



GROUP GOVERNANCE & COMPLIANCE

# Whistleblowing Policy

## CONTECH Group

Our Speak Up commitment — how to raise concerns about wrongdoing, safely and in confidence

| Document Control     |                                                                         |
|----------------------|-------------------------------------------------------------------------|
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| Approved by          | Gazmend Kelmendi, Group Chief Executive Officer, on behalf of the Board |
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## 1. Policy Statement

CONTECH Group (“CONTECH”, “the Group”, “we”) is committed to conducting business honestly, safely and with integrity. We want everyone connected with the Group to feel able to speak up about wrongdoing without fear. Raising a genuine concern is not disloyalty — it protects our people, our clients and our business, and it is exactly what our Code of Conduct asks of you.

This Policy explains how to raise concerns about suspected wrongdoing, how we will handle them, and the protection available to those who speak up. No one who raises a concern in good faith will suffer any disadvantage as a result.

### How to speak up

- Speak to your line manager, or — if that is not appropriate — to senior management.
- Contact the Group’s Responsible Officer for whistleblowing.
- Report in confidence, including anonymously, to [ethics@contech.biz](mailto:ethics@contech.biz).
- **You will not suffer any disadvantage for raising a genuine concern in good faith.**

## 2. Purpose

The purpose of this Policy is to encourage and enable the reporting of suspected wrongdoing at the earliest opportunity, to set out clear and safe reporting channels, to reassure those who raise concerns that they will be protected from retaliation, and to explain how concerns are investigated and resolved.

## 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 may be used by anyone who has a work-based relationship with the Group, including directors, officers, employees, workers, agency staff, interns and apprentices. Suppliers, subcontractors, consultants and members of the public may also raise concerns about the Group through the channels set out below.

## 4. What This Policy Covers

This Policy covers genuine concerns about wrongdoing, malpractice or danger connected with the Group’s activities where there is a wider public interest — not only where it affects you personally. Examples are given in Section 6.

This Policy is not a route for personal complaints about your own employment — such as pay, terms and conditions, or working relationships. Those matters should be raised through the Group’s grievance procedure. If a personal complaint also raises a genuine public-interest concern of the kind described in this Policy, it may be treated as a whistleblowing matter.

## 5. Legal Framework

### 5.1 United Kingdom

The Public Interest Disclosure Act 1998 protects workers who make a “protected disclosure” from being subjected to a detriment or dismissed as a result. A protected disclosure is one that, in the worker’s reasonable belief, is made in the public interest and tends to show a criminal offence, a failure to comply with a legal obligation, a miscarriage of justice, a danger to health and safety, damage to the environment, or the deliberate concealment of any of these.

## 5.2 Kosovo

Law No. 06/L-085 on the Protection of Whistleblowers (in force since January 2019) and Regulation (GRK) No. 03/2021 regulate whistleblowing in the public and private sectors. They provide three reporting channels — internal, external to a responsible authority, and public disclosure — require covered employers to appoint a responsible officer to receive and handle reports, and protect whistleblowers from retaliation. External reports may be made to the Agency for Prevention of Corruption.

## 5.3 International good practice

Our approach also has regard to Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, with which the Kosovo regulation is aligned.

# 6. Examples of Reportable Concerns

The kinds of concern covered by this Policy include, but are not limited to:

- a criminal offence, including bribery, corruption, fraud or theft;
- a failure to comply with a legal or regulatory obligation;
- a danger to the health or safety of any person;
- damage to, or a risk of damage to, the environment;
- modern slavery, human trafficking, forced or child labour, or other abuse of human rights;
- discrimination, harassment, bullying or victimisation;
- a miscarriage of justice;
- the misuse of the Group's funds, assets or authority; or
- the deliberate concealment of any of the above.

## 7. How to Raise a Concern

We encourage you to raise concerns as early as possible. You may:

- raise the concern with your line manager, or — where that is not appropriate — with senior management;
- contact the Group's Responsible Officer for whistleblowing; or
- report in confidence through the Group's dedicated channel at [ethics@contech.biz](mailto:ethics@contech.biz).

You may raise a concern anonymously. Providing your identity, which we will keep confidential, will usually help us to investigate, but it is not a requirement. When raising a concern, please give as much detail as you can — what happened, when and where, who was involved, and any supporting information — so that it can be properly assessed.

## 8. Confidentiality and Anonymity

We will treat your concern confidentially and will seek to protect your identity. We will not disclose it without your consent unless we are required to do so by law or in order to carry out a fair investigation, and in such cases we will, where possible, discuss this with you first. Anonymous reports are accepted and taken seriously, although they can be more difficult to investigate.

## 9. Protection from Retaliation

No one who raises a concern in good faith will be dismissed, disciplined, victimised or subjected to any other detriment or unfavourable treatment as a result — even if the concern later proves to be mistaken. Retaliation against a person who has raised a concern, or who has assisted an investigation, is a serious disciplinary matter and may also be unlawful. If you believe you have suffered any detriment for speaking up, you should report it immediately through the channels in this Policy.

## 10. Good Faith and False Reports

You are protected under this Policy where you have a reasonable belief that the information you report is true and that raising it is in the public interest, even if you turn out to be mistaken. You do not need to have proof, and you are not expected to investigate the matter yourself. However, knowingly making a false, malicious or vexatious allegation is a misuse of this Policy and may itself result in disciplinary action.

## 11. How We Handle Concerns

When a concern is received, we will acknowledge it, assess it, and decide how it should be handled. Where an investigation is appropriate, it will be carried out fairly, proportionately and promptly by a suitable person who is not involved in the matter. We aim to acknowledge a report within seven days and to provide feedback within a reasonable period, ordinarily not exceeding three months, consistent with applicable law. We will keep the person who raised the concern informed so far as is appropriate and lawful, though we may not always be able to share the outcome in full for reasons of confidentiality.

## 12. External Reporting

We encourage you to raise concerns internally so that we can address them. This Policy does not, however, remove your right to report to a competent external authority. In Kosovo, external reports may be made to the Agency for Prevention of Corruption or another responsible authority; in the United Kingdom, concerns may be reported to a relevant regulator or prescribed person. Reporting to external authorities, and in limited circumstances public disclosure, may be protected under applicable law.

## 13. Roles, Responsibilities and the Responsible Officer

The Group appoints a Responsible Officer for whistleblowing, whose name is made available to those within scope, to receive and handle reports and to safeguard the confidentiality of those who speak up, consistent with the requirements applicable to the Group under Law No. 06/L-085.

- **The Board and Group CEO** support a culture in which people feel safe to speak up, and approve this Policy.
- **Executive management** maintain the reporting channels, appoint the Responsible Officer, and ensure that concerns are investigated and acted upon.
- **Line managers** take any concern raised with them seriously, escalate it appropriately, and protect the person who raised it from retaliation.
- **All personnel** are encouraged to report concerns and to cooperate with investigations.

## 14. Records, Data Protection and Review

We keep records of reports and how they are handled securely and confidentially, and we process any personal data in accordance with applicable data-protection law (the Kosovo Law on Personal Data Protection and, for the United Kingdom, UK GDPR and the Data Protection Act 2018). We communicate this Policy to our people, provide guidance and training as appropriate, and monitor its operation.

## 15. Governance, Related Documents and Approval

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 Anti-Bribery and Anti-Corruption Policy, the Human Rights Policy, the Diversity, Equity & Inclusion and Equal Opportunity Policy, the Supplier and Subcontractor Codes of Conduct, and the grievance procedure. It will be reviewed at least annually, and sooner if required by changes in law, in the Group's structure or in operating practice.

### Approved on behalf of CONTECH Group

|                         |                               |
|-------------------------|-------------------------------|
| <b>Name</b>             | Gazmend Kelmendi              |
| <b>Position</b>         | Group Chief Executive Officer |
| <b>Date of approval</b> | 11 May 2026                   |

### Contact

Concerns may be reported in confidence to **[ethics@contech.biz](mailto:ethics@contech.biz)**. General questions about this Policy may be directed to Group Executive Management or to **[info@contech.biz](mailto:info@contech.biz)**.

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