GT GARDINER &THEOBALD

GARDINER & THEOBALD'S

Code of Conduct

Delivering World Class Service

Our Code

December 2026

Message from our Managing Partner

Dear Colleagues,

At Gardiner & Theobald ('G&T' or the 'Firm'), how we work is as important as what we deliver. For almost 200 years, our reputation has been built on professionalism and integrity – and the trust placed in us by our clients, Partners, and each other.

Every day, we support our clients in navigating complex construction, property, and infrastructure challenges – bringing clarity, insight, and judgement, to help them make confident decisions and achieve lasting value.

Our success is grounded not only in technical excellence, but in the way that we behave – working collaboratively, acting responsibly, and holding ourselves to consistently high standards. We are committed to creating a positive impact through our work – supporting our clients and contributing to the communities in which we operate.

Our *Code of Conduct ('Our Code')* sets out the principles and commitments that guide how we do business. It provides a clear framework for decision-making in our day-to-day work, and reflects the minimum standards that we expect of all our people (regardless of seniority, role or location) and those with whom we work (including business partners and other third parties). Ultimately, it ensures that we continue to act with integrity, build trust, and uphold the standards that define the Firm.



Adam Glover
Managing Partner
Gardiner & Theobald LLP



Please take time to read and understand *Our Code*. If you have any questions, please discuss with your line manager, Partner, or our Compliance Team.

Contents

0 Introduction 4
About G&T 5
Our Core Principles and Commitments 6
How to use *Our Code* 7

1 About *Our Code* 8
Our Code 9
Our Obligations 10
Our Leaders 11
Ethical Business Decisions 12
Speak Up and Raise Concerns 13

2 Conduct Business with Integrity 16
Anti-bribery and Corruption 17
Conflicts of Interest 18
Anti-fraud 19
Sanctions and Trade Controls 20
Anti-tax Evasion and Money Laundering 21
Fair Competition 22
Third Parties 23

3 Protect our Business 24
Assets and Resources 25
Personal Information 26
Inside Information 27
Business Communications 28
Artificial Intelligence (AI) 29

4 Protect our People 30
Health and Safety 31
Equality, Diversity and Inclusion 32

5 Protect our Communities 33
Social Value 34
Sustainability 35
Human Rights and Modern Slavery 36

Appendix 1: Ethics & Compliance 37
Appendix 2: G&T Policies 39
Appendix 3: Useful Definitions 41

0

Introduction

In this section:

About G&T 5
Our Core Principles and Commitments 6
How to use *Our Code* 7

About G&T

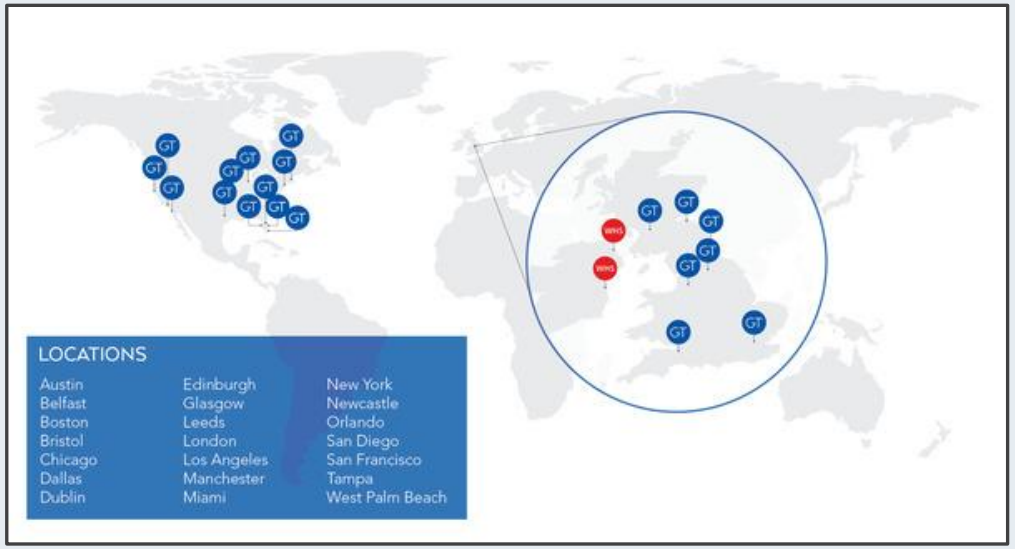
G&T is a partner-led consultancy delivering cost, project and infrastructure services across the built environment.

We work across the UK, Ireland and the US.
Our workforce of over 1,500 people supports clients on projects of every scale – from complex infrastructure to landmark developments.

We are Partner-led and people-powered.
We combine deep expertise with fresh thinking, human insight, and evolving digital capability – to help clients make informed decisions, manage risk, and deliver successful outcomes.

We are regulated by the Royal Institution of Chartered Surveyors (RICS).
We operate to the highest professional standards across all our work.

G&T Offices – including WH Stephens (WHS), which is a G&T company.



Regulated by RICS®

RICS corporate website: www.rics.org

Our corporate website: www.gardiner.com

Our Core Principles and Commitments

Our Core Principles

Our mission is to find solutions to complex construction, property and infrastructure challenges, to create positive outcomes for our clients and their stakeholders.

We do this by:

1) **World Class Service delivery to our clients, always.**
2) **Recruiting, developing, retaining and rewarding exceptional people.**
3) **Remaining financially sound.**

Our Commitments

The following commitments set out how we put our core principles into practice:

Clients	**Our clients are at the heart of everything we do.** We listen, adapt and deliver solutions that meet their needs, while building long-term partnerships based on trust and results.
Quality	**World class service delivery is our promise.** Every project benefits from our Partner-led approach, rigorous methods and professional excellence.
People	**Our people drive our success.** We invest in skills, value diverse perspectives, and reward talent in a true meritocracy.
Innovation	**We embrace digitalisation and new technologies.** We work productively, while maintaining the human relationships, insights and expertise that define our services.
Social Value	**We aim to make a positive social impact.** We work proactively to support local communities and advance sustainability across the built environment.

How to use *Our Code*

Using this document:

- ***Our Code* has five easy-to-read sections** with which we each need to familiarise ourselves.
- **Each section includes relevant topics** providing:
  1) Key principles and commitments.
  2) Links to key supporting G&T policies.
  3) G&T's related accreditations, where applicable.
- **Appendices provide**:
  1) A list of G&T's policies.
  2) Definitions of terms commonly used within *Our Code*.

G&T's Supporting Policies:

Our Code references G&T's key supporting policies, but it does not replace the need to be fully conversant with these policies, together with any associated procedures and controls. Our polices and procedures are part of our broader Ethics & Compliance (E&C) Programme

Each of us is expected to understand the G&T policies and procedures applicable to our role, and comply with their requirements in our day-to-day work.

Applicable Laws and Regulations:

Our Code also references some relevant laws and regulations, but this is not an exhaustive list.

Each of us is expected to comply with all laws, regulations and professional standards applicable to our role, and to the Firm. If in doubt, we each have an obligation to seek guidance, before making a business decision or taking action.

RICS Standards
- *Rules of Conduct*.
- International Standards.

1

About *Our Code*

In this section:

Our Code 9
Our Obligations 10
Our Leaders 11
Ethical Business Decisions 12
Speak Up and Raise Concerns 13

Our Code

Purpose of *Our Code*

- **Reminds us of our Firm's core principles and commitments, to help us make better decisions.**
- **Outlines our key commitments and principled approach to conducting business.**
- **Sets strict acceptability standards for acting ethically, responsibly, safely, legally and compliantly.**
- **Provides guidance on where to seek advice or further information.**
- **Clarifies our individual obligation to Speak Up and raise concerns relating to misconduct.**
- **Fosters better internal and external working relationships, by creating an ethical culture to support our Firm in its continued success.**
- **Provides an overview of G&T's Ethics & Compliance (E&C) Programme, which is illustrated in Appendix 1.**

Applicability of *Our Code*

- **Applicable to our entire business:**
  This includes our operations in the UK, Ireland and the US.
- **Applicable to all our people:**
  G&T employees, partners and any workers who have a contractual relationship with the Firm (including temporary workers, work experience students/interns, and volunteers), who are engaged within any entity owned and operated by G&T worldwide.
- **Applicable to all third parties:**
  Any individual or entity external to G&T that has a contractual relationship with the Firm and works with, or on behalf of, G&T. Third parties include (but are not limited to) subconsultants, subcontractors, outside assistants (OAs), suppliers, contractors, service providers, agents, advisors, and business and joint venture partners – including the employees and other workers (whether paid or unpaid) of these third parties.
- **Conflict with local laws and regulations:**
  Where local laws or regulations are less stringent than *Our Code* and supporting policies, we must consistently apply the higher standard, to maintain the Firm's integrity.

Our Obligations

We each have an obligation to understand and comply with *Our Code* in our day-to-day work roles:

- ✓ **Read and understand *Our Code*** – and put it into practice every day to support delivery of our role for G&T.
- ✓ **Comply** – with G&T's policies, procedures, controls, and approval requirements.
- ✓ **Follow our *Business Management System (BMS)*** – and supporting *Professional Services Guidance Manual (PSGM)*.
- ✓ **Act with integrity** – and always uphold the highest ethical and professional standards when making business decisions.
- ✓ **Maintain** – professional qualifications and memberships relevant to our role.
- ✓ **Discuss *Our Code*** – with our line manager, Partner and colleagues, to understand how it applies to our roles.
- ✓ **Complete training** – including mandatory training and continuing professional development, as required by the Firm.
- ✓ **Monitor third parties** – for assurance that they are complying with equivalent standards to those of our Firm.
- ✓ **Lead by example** – by setting an appropriate culture and demonstrating ethical conduct (even if our role is not supervisory).
- ✓ **Ask questions** – if in doubt, or where something doesn't look or feel right.
- ✓ **Speak Up** – immediately with any suspicions or concerns of potential misconduct.

Our Leaders

Leaders across our business must demonstrate strong leadership and promote a positive culture.

Each of us is expected to 'lead by example', but our leaders have a particular responsibility for consistently being a role model for acting ethically, legally, responsibly, safely, fairly and respectfully.

Our leaders must:

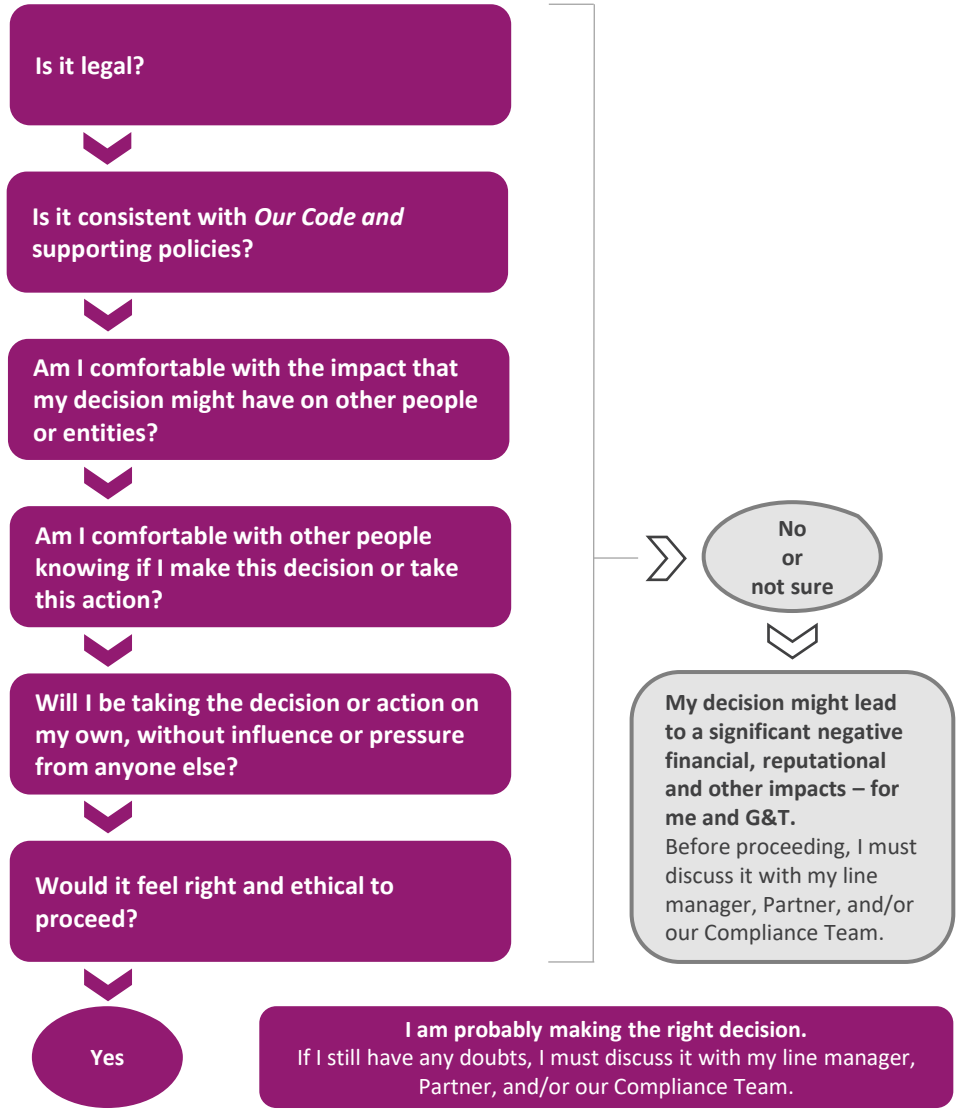
- ✓ **Identify, assess and mitigate risks within their business area(s)** – including risks related to bribery, fraud, tax evasion and breaches of professional standards.
- ✓ **Set clear and realistic goals** – and provide appropriate guidance and inspiration for achievement.
- ✓ **Create opportunities for our people** – to develop and fulfil their potential.
- ✓ **Be a role model** – to clearly demonstrate acceptable behaviour and fairly address what is unacceptable.
- ✓ **Be accountable** – for their actions and the performance of their teams.
- ✓ **Provide appropriate recognition** – to reward our people not just for what they achieve, but for achieving it ethically and compliantly.
- ✓ **Proactively collaborate** – to maximise the effectiveness of teamwork, with internal and external stakeholders.
- ✓ **Reinforce the importance of Speak Up** – in an open and fair environment, without fear of negative consequences.
- ✓ **Listen to reported Speak Up concerns** – and address them promptly and appropriately, in conjunction with our Compliance Team.

Ethical Business Decisions

Our Code **guides us each in the key principles to follow, so that we consistently make ethical business decisions which are in the best interests of G&T – even for business situations not specifically covered within *Our Code*.**

The 'Quick Test' illustrated is intended to help each of us assess whether we are making an ethical decision.

We should ask ourselves the questions opposite, before proceeding with our intended decision or action:



Speak Up and Raise Concerns

We each have an obligation to immediately Speak Up and raise a concern, if something doesn't seem right and ethical.

Breaches of *Our Code* are taken seriously and investigated thoroughly.

Every reported concern is treated promptly, respectfully, objectively and confidentially.

G&T has zero tolerance for retaliation against anyone who raises a genuine concern in good faith.

There are various channels for reporting your concerns:

1) **Discuss with your line manager or Partner** – as they are typically best-equipped to address concerns promptly.

2) **Discuss with your Main Board Partner or Managing Partner** – if you feel more comfortable than discussing with your line manager.

3) **Discuss with our Compliance Team** – who will independently and confidentially investigate your concern: Compliance@Gardiner.com.

4) **Report to our Speak Up e-mail channel** – which is confidentially managed by our Compliance Team: SpeakUp@Gardiner.com.

5) **Contact the relevant G&T Support Team** – such as Human Resources, Health & Safety, Finance, Legal, or Information Technology.

6) **Report via 'Safecall'** – an independent and confidential external reporting service operated for G&T by a specialist provider. You can report online or by telephone. You can remain anonymous, if you wish.
Website: www.safecall.co.uk/clients/gardiner-Theobald.
UK freephone number: 0800 915 1575.
International freephone numbers: www.safecall.co.uk/freephone.

7) **Report to relevant authorities** – *Our Code* doesn't prevent reporting of concerns to external regulators or law enforcement authorities, but we encourage concerns to be initially raised internally within G&T, so that the Firm can support promptly and effectively.

Key Policies
- *Whistleblowing Policy.*
- *Complaints Handling Procedure.*
- *Disciplinary Rules and Procedures*.

Speak Up and Raise Concerns

(continued)

Concerns to be reported:

- Suspected breach of *Our Code*, or supporting policies and procedures.
- Suspected breach of laws, regulations or professional standards.
- Suspected bribery, fraud, tax evasion or other serious misconduct.
- Suspected conflict of interest (individual or organisational).
- Concerns regarding health, safety, welfare, or the environment.
- Concerns relating to any form of disrespect, bullying, harassment, discrimination or retaliation.
- Any situation which could present a financial or reputational risk to G&T.

Investigation of reported concerns:

- Our Compliance Team assesses every reported concern and determines the most appropriate approach for each investigation.
- Investigations are conducted thoroughly, professionally and independently. Confidentiality is maintained (to the extent possible).
- Throughout the investigation, the reporting person is periodically updated with progress (as appropriate, and where the report was not made anonymously).
- Details of the investigation outcome and remedial action is communicated at the end of the investigation (as appropriate, to maintain confidentiality).

SpeakUp@gardiner.com

Speak Up and Raise Concerns
(continued)

Breaches of *Our Code*:

- *Our Code* and supporting policies reflect what is important to the Firm.
- Actual or potential breaches are taken seriously, and consequences for breaches will be dependent upon the nature and severity of the breach. Consequences may range from a verbal warning to termination of employment (or other contractual relationship). Consequences may be applied to the person responsible for the breach, but also to anyone who was aware of the breach and did not report it.

Assistance during investigations:

- We each have an obligation to properly address any concerns raised – even if we were not personally involved or the concern does not relate to our business area.
- Each of us is obliged to cooperate fully and honestly, when requested to support a Speak Up investigation – by proactively providing clear, complete, and truthful information, including any relevant documents. In some cases, this may include requests to share information stored within non-G&T devices and personal accounts – where necessary, proportionate and legally justified.

Complaints by third parties against G&T:

- **Complaints by third parties against G&T** – Dissatisfaction with our professional services must be discussed with the relevant main point of contact within G&T. If a complaint needs to be formalised, it must be reported in accordance with our *Complaints Handling Procedure*.

Speak Up immediately if you have any concern that something does not seem right. If in doubt, ask questions before making a decision or taking action. Our Compliance Team is always available to provide support and guidance!

Compliance@gardiner.com

2

Conduct Business with Integrity

In this section:

Anti-bribery and Corruption 17
Conflicts of Interest 18
Anti-Fraud 19
Sanctions and Trade Controls 20
Anti-tax Evasion and Money Laundering 21
Fair Competition 22
Third Parties 23

Anti-bribery and Corruption

We are committed to conducting business without engaging in bribery, kickbacks or any other form of corruption to gain an unfair business advantage – regardless of where we are operating and with whom we are interacting.

In practice, our commitments are to:

- Understand the various ways in which the Firm or our clients could be subjected to bribery, and be alert to bribery-related risks and indicators.
- Maintain an effective risk-based framework of procedures and controls to deter, prevent and detect bribery.
- Conduct risk-based due diligence on clients and third parties, and only conduct business with those that are reputable and ethical.
- Take additional care to ensure that interactions with public officials, politically exposed persons (PEPs), and government organisations are transparent, fully documented and appropriately approved, as they present an elevated risk.
- Comply with our rules relating to business gifts and hospitality, donations, lobbying, and sponsorships.
- Prohibit the use of facilitation payments, irrespective of whether customary or permitted under local laws.
- Maintain clear, accurate, and complete business records – including details of all business arrangements and financial transactions.
- Comply with applicable anti-bribery laws – including the UK *Bribery Act (UKBA) 2010* and US *Foreign Corrupt Practices Act (FCPA)* of 1977.
- Comply with the *RICS Professional Standard on Countering Bribery, Corruption, Money Laundering & Terrorist Financing.*

Key Policies
- *Anti-bribery Policy & Related Business Rules*.

Accreditations
- *International Standard ISO 37001 (Anti-bribery Management System)*.
- *Financial Services Qualification System (FSQS) Supplier.*

RICS Professional Standards
- *Countering Bribery, Corruption, Money Laundering and Terrorist Financing*.

Conflicts of Interest

We are committed to making objective business decisions which are in the best interests of our clients and the Firm, by conducting business to avoid actual, potential or perceived conflicts of interest (COI) situations. Where COI situations cannot be avoided, they must be transparently declared and properly managed.

In practice, our commitments are to:

- Understand what situations would or could constitute a conflict of interest – either upon us as individuals or organisationally as a Firm.
- Recognise that even perceived COI situations can cause significant damage.
- Avoid COI situations wherever possible.
- Ensure that COI situations are promptly, fully and transparently declared when they arise.
- Proactively take appropriate steps to manage any COI situations which cannot be avoided, and cooperate with any remedial actions deemed necessary by G&T and our clients.
- Comply with the *RICS Professional Standard on Conflicts of Interest.*

Key Policies

- *Conflicts of Interest Policy*.

RICS Professional Standards

- *Conflicts of Interest*.

Anti-fraud

We are committed to conducting business without intentionally engaging in, or facilitating, fraud of any kind. We have zero tolerance for any fraud committed against the Firm by our people or third parties.

In practice, our commitments are to:

- Understand and remain alert to the various ways in which the Firm or our clients could be impacted by fraud offences – including false representation, abuse of position, and obtaining services dishonestly.
- Remain alert to fraud-related risks and indicators.
- Maintain an effective risk-based framework of anti-fraud procedures and controls to deter, prevent and detect fraud.
- Conduct risk-based due diligence on clients and third parties.
- Only conduct business with reputable and ethical third parties.
- Maintain accurate and complete business records.
- Comply with applicable anti-fraud laws – including the UK *Fraud Act 2006* and *Economic Crime & Corporate Transparency Act (ECCTA) 2023.*
- Comply with the *RICS Professional Standard on Countering Bribery, Corruption, Money Laundering & Terrorist Financing.*

Key Policies

- *Anti-fraud Policy*.

RICS Professional Standards

- *Countering Bribery, Corruption, Money Laundering and Terrorist Financing*.

Sanctions and Trade Controls

We are committed to compliance with applicable sanctions, embargoes and trade controls, which may prohibit or restrict the Firm from doing business with certain countries or industry sectors, or with sanctioned entities or individuals.

In practice, our commitments are to:

- Understand that the global regime of sanctions and trade controls is complex, and constantly subject to changes.
- Recognise that this regime imposes restrictions on where we can operate, and the services which can be provided.
- Conduct risk-based due diligence on third parties, including screening against sanctions lists, including those issued by the UK, US, and European Union (EU).
- Adhere to the Firm's framework of sanctions-related procedures and controls.
- Maintain accurate and complete business records.
- Maintain awareness of sanctions-related risks and indicators.
- Comply with the *RICS Professional Standard on Countering Bribery, Corruption, Money Laundering & Terrorist Financing.*

Key Policies

- *Due Diligence, Money Laundering & Sanctions Policy.*

RICS Professional Standards

- *Countering Bribery, Corruption, Money Laundering & Terrorist Financing.*

Anti-tax Evasion and Money Laundering

We are committed to compliance with applicable tax evasion, money laundering, and counter-terrorism financing laws, and preventing third parties from exploiting the Firm to engage in such activities.

In practice, our commitments are to:

- Understand our obligations as a RICS regulated Firm to avoid the facilitation of tax evasion, money laundering, and terrorism financing, and be alert to associated risks.
- Maintain an effective risk-based framework of procedures and controls to prevent facilitation of such activities.
- Maintain awareness of signs which may indicate the risk of tax evasion or money laundering – such as discrepancies in entity names, locations or bank accounts, or requests for payments in cash.
- Only conduct business with reputable clients and third parties.
- Conduct risk-based due diligence on clients and third parties.
- Accept funds only from legitimate and verified sources.
- Exercise additional caution with third parties which are government entities or connected to politically exposed persons (PEPs).
- Maintain accurate and complete business records.
- Comply with the *RICS Professional Standard on Countering Bribery, Corruption, Money Laundering & Terrorist Financing.*

Key Policies

- *Anti-tax Evasion Policy.*
- *Due Diligence, Money Laundering & Sanctions Policy.*

RICS Professional Standards

- *Countering Bribery, Corruption, Money Laundering & Terrorist Financing.*

Fair Competition

We are committed to competing proactively for new business and projects, but ensuring that this is undertaken fairly and in compliance with applicable competition (or antitrust) laws.

In practice, our commitments are to:

- Understand that competition law is complex and varies significantly between different countries.
- Never exchange confidential or commercially sensitive information with G&T's competitors, unless there is a legitimate and legal requirement.
- Never engage in collusion with G&T's competitors or others (formally or informally), to promote unfair competition in the market or be perceived as collusion or anti-competitive behaviour.
- Take appropriate care and safeguards when participating in industry forums, associations, or meetings which are attended by G&T's competitors.
- Maintain accurate and complete business records, including meeting minutes.
- Ensure that the Firm's terms and conditions of engagement are clear, fair, and unambiguously stated – to promote fair competition and avoid improper influence.
- Comply with applicable competition laws – including the UK *Competition Act 1998*, the US *Sherman Antitrust Act* of 1890, the US *Clayton Act* of 1914, and the US *Federal Trade Commission (FTC) Act* of 1914.
- Comply with the *RICS Rules of Conduct.*

Key Policies

- *Anti-bribery Policy & Related Business Rules*.

RICS Professional Standards

- *Rules of Conduct.*

Third Parties

We are committed to maintaining long-term and mutually beneficial relationships with each of our clients, and each of the third parties which support us in delivering our professional services.

In practice, our commitments are to:

- Value the respectful and productive relationships which we have developed with our third parties – including (but not limited to) subconsultants, subcontractors, outside assistants (OAs), suppliers, contractors, service providers, agents, advisors, and business partners.
- Acknowledge the importance of these relationships in delivering our professional services.
- Conduct risk-based due diligence on new clients and third parties.
- Subject existing clients and third parties to continuous screening, and periodic risk-based due diligence.
- Only conduct business with reputable and ethical third parties which acknowledge commitment to standards equivalent to *Our Code*.
- Recognise that third parties need to meet our requirements for ethical and lawful conduct – as well as our standards relating to health, safety, environment and human rights.
- Monitor the performance of third parties and, where necessary, encourage improvements to meet G&T's standards.
- Appropriately manage or terminate contractual relationships where third parties do not meet our required standards.
- Comply with the *RICS Rules of Conduct.*

Key Policies

- *Third-party Code of Conduct.*

RICS Professional Standards

- *Rules of Conduct*.

3

Protect our Business

In this section:

Assets and Resources 25
Personal Information 26
Inside Information 27
Business Communications 28
Artificial Intelligence (AI) 29

Assets and Resources

We are committed to safeguarding our Firm's assets from loss, damage, theft, misuse, negligence and unauthorised access. Our assets include physical assets (such as cash, facilities, equipment, and devices) and non-physical assets (such as information, technology, service delivery processes, and intellectual property).

In practice, our commitments are to:

- Acknowledge that our physical and non-physical assets – in addition to our people – are valuable resources which contribute towards the Firm's competitive advantage and continued success.
- Use assets only for their intended purpose and as authorised.
- Never use unauthorised systems or tools (including Artificial Intelligence), to conduct our business, or share the Firm's or third-party information.
- Maintain strict confidentiality over the Firm's and third-party information, including during external interactions.
- Diligently protect the Firm's devices (including mobile telephones, laptops, and security access devices), accounts, passwords, and intellectual property (IP), and remain alert to risks.
- Immediately report any security breaches or incidents.

Key Policies

- *Quality Policy Statement.*
- *Information Security Policy.*
- *Acceptable Use Policy.*
- *Copyright Policy.*

Accreditations

- *International Standard ISO 9001 (Quality Management System).*

Personal Information

We are committed to handling personal information with significant care, and respect for the rights of individuals to privacy. This includes personal information about our people, and where the Firm is entrusted with such personal information from third parties.

In practice, our commitments are to:

- Understand what constitutes personal information and the principles which must be followed when handling it.
- Only collect, store, use, disclose and retain personal information, as reasonably necessary to meet business requirements. Appropriately monitor and safeguard personal information, to ensure that it is only used for appropriate, ethical, legal and authorised purposes.
- Only share personal information with third parties where there is a legitimate business purpose, expressed permission, or legal requirement.
- Take additional care when handling sensitive personal information (such as relating to race, religion, politics, health, medical or biometric data).
- Remain diligent to risks and vulnerabilities which could threaten the safeguarding of personal information.
- Take responsible steps to safeguard the Firm's devices (such as mobile telephones and laptops), and safeguard all accounts and passwords pertaining to the protection of personal information.
- Comply with all applicable data protection laws – including the UK *General Data Protection Regulation (GDPR),* and applicable US federal sector-specific laws and state privacy laws.
- Immediately report any potential data security incidents to the IT Helpdesk.

Key Policies

- *Privacy Notice.*
- *Data Protection Policy.*
- *Data Classification & Handling Policy.*
- *Data & Document Retention Policy.*
- *Data & Document Disposition Policy*.

Accreditations

- *Cyber Essential Plus Scheme.*
- *Cyber Assurance Level Two*.

Inside Information

We are committed to treating inside information confidentially and responsibly, so that it is not used to engage in insider trading.

In practice, our commitments are to:

- Understand what constitutes inside information and insider trading, and the associated rules of global trading exchanges and regulators.
- Recognise that inside information is a valuable resource, and inappropriate use is unethical and may be illegal.
- Maintain confidentiality of inside information entrusted to us by our clients and other third parties (in line with contractual relationships).
- Understand that the communication of false or misleading information may be fraud and a criminal offence.
- Never trade in financial or commodities markets (directly or indirectly), when in the possession of inside information.
- Never share inside information with family, friends or third parties, when it could be used to encourage or facilitate insider trading.
- Comply with applicable insider trading laws – including the UK *Criminal Justice Act 1993* and *Market Abuse Regulation of 2016*.

Key Policies

- *Anti-fraud Policy*.

Business Communications

We are committed to communicating clearly, consistently, honestly and transparently – both internally and externally.

In practice, our commitments are to:

- Provide clear and concise professional advice to our clients, ensuring that appropriate measures are taken to ensure that communications are accurate, effective and unambiguous.
- Diligently comply with the Firm's procedures and controls, including review and approval requirements.
- Carefully consider the potential impact of any external communications about G&T's business and third parties, prior to issuing.
- Seek appropriate approval for any external speeches, presentations, articles, or events attended on behalf of G&T.
- Use social media carefully, respectfully, and responsibly, and never provide comment on behalf of G&T unless it has been previously approved.
- Comply with the Firm's rules regarding the use of AI for business purposes.
- Understand that the communication of false or misleading information may be fraud and a criminal offence.
- Maintain appropriate evidence to support business decision-making, financial and non-financial reporting, and verification of compliance.

Key Policies

- *External Communications Policy.*
- *Social Media Policy.*
- *Copyright Policy.*
- *Information Technology (IT) Communication System Policy.*
- *Acceptable Use Policy.*

Artificial Intelligence (AI)

We are committed to using AI-powered tools for business-related activities, to enhance productivity and service delivery to our clients – but only where such AI is used carefully, ethically, transparently, and responsibly.

In practice, our commitments are to:

- Understand and recognise what constitutes AI-powered technology, and the risks associated with its use for business purposes.
- Comply with G&T's *AI Policy*.
- Use only AI-powered tools approved by G&T for business purposes, and ensure that each tool is used strictly for the specifically approved purpose.
- Prohibit the use of AI-powered tools on non-G&T devices (such as mobile phones and laptops) for business purposes.
- Limit the use of AI-powered tools for business purposes to basic research only, which does not utilise G&T information classified as internal, confidential, personal or highly sensitive.
- Diligently check the output of any AI-generated information prior to use, to ensure that it is accurate, complete and assured for quality.
- Comply with all applicable laws, regulations, commercial obligations and IP rights when using AI.

Key Policies

- *AI Policy.*

RICS Professional Standards

- *Responsible Use of AI in Surveying Practice*.

4

Protect our People

In this section:

Health and Safety 31
Equality, Diversity and Inclusion 32

Health and Safety (H&S)

We are committed to providing our people with a healthy and safe workplace – and a culture which protects their physical and psychological safety, regardless of their workplace location.

In practice, our commitments are to:

- Operate the Firm in a manner which ensures that our people are protected from foreseeable H&S hazards and risks, as far as reasonably practicable.
- Comply with applicable H&S legislation and regulations.
- Adhere to our *Health & Safety Policy.*
- Take reasonable steps to protect the health and safety of those that may be affected by our operations.
- Proactively promote a culture where everyone is responsible for health and safety.
- Maintain appropriate health and safety standards, and provide appropriate awareness training.
- Provide a range of health and well being support initiatives for our people.

Key Policies

- *Health and Safety Policy*.

Accreditations

- *Achilles Utilities Vendor Database (UVDB) Supplier*.

Equality, Diversity and Inclusion (EDI)

We are committed to respecting and valuing our people. We ensure that each of us behaves fairly, inclusively and supportively – when interacting with our people, clients, and third parties alike. We strive to support everyone to reach their full potential.

In practice, our commitments are to:

- Promote fairness, respect, diversity and inclusion across the Firm, and throughout our operations.
- Demonstrate zero tolerance to any form of workplace disrespect, discrimination, bullying, or harassment (remembering that the test of whether conduct is offensive is subjective and dependent upon the recipient).
- Encourage positive behaviours (during internal and external interactions) – such as active listening, inclusive teamwork, and proactive approaches to ensuring that everyone feels welcome and valued.
- Promote respectful behaviours throughout the workday and beyond – such as during business travel, social situations, and use of social media.
- Engage with our EDI policies and training materials, to support a fair, diverse and inclusive work environment.
- Support our people with professional training and development, and a broad health and well-being programme.
- Appropriately address any conduct which does not align with *Our Code*.
- Comply with applicable employment laws and regulations.

Key Policies

- *Anti-harassment Policy.*
- *Equality, Diversity & Inclusion (EDI) Policy.*

Accreditations

- *Armed Forces Covenant.*
- *Disability Confident Employer*.

5

Protect our Communities

In this section:

Social Value 34
Sustainability 35
Human Rights and Modern Slavery 36

Social Value

We are committed to working in a way that identifies and supports positive community outcomes from our presence in local areas. We work with our clients to deliver benefits for the communities in which we operate.

In practice, our commitments are to:

- Understand that each of our people has a responsibility to support G&T in meeting the Firm's commitments, and help our clients fulfil their duties under the UK *Public Services (Social Value) Act 2012* and the supporting *Social Value Model* procurement tool.
- Consider local people and context when developing our services – showing respect for community needs, local priorities, and the potential effect of our project activity on day-to-day life.
- Contribute to social value in ways that align with our *Social Value Policy* and broader Environmental, Social & Governance (ESG) guidance, and support awareness through training and knowledge sharing.
- Record and evidence social value activity accurately – including notifying the relevant internal leads where required, and ensuring that activity is captured through social value reporting platforms (such as Thrive).
- Facilitating our people to be able to support social value charities and community projects, thorough our *Employee-generated Volunteering (EGV) Policy*.

Key Policies

- *Social Value Policy.*
- *Employee-generated Volunteering (EGV) Policy.*

Sustainability

We are committed to delivering our services in a responsible and sustainable way, while supporting our clients to reduce carbon emissions across their projects. Through this, we contribute to reducing the impacts of climate change.

In practice, our commitments are to:

- Remain up-to-date with sustainability developments across our industry sector – to ensure that we meet our clients' needs, while supporting positive environmental outcomes.
- Maintain the highest environmental standards, in line with our *Sustainability Policy*, and support awareness through training and knowledge sharing.
- Support delivery of the Firm's *Net Zero Carbon Policy* and contribute to achieving net zero carbon by 2030.
- Set environmental goals and develop appropriate action plans – and actively track, manage and report upon our performance.
- Take practical steps to reduce energy consumption across the Firm's office locations.
- Follow the Firm's responsible approach to waste management and recycling, and comply with applicable legislation.
- Ensure that our people take personal responsibility for developing knowledge of key sustainability topics relevant to their roles and clients – such as reuse, biodiversity, energy efficiently, and climate resilience.
- Proactively engage with clients, third parties and stakeholders – to identify environmental risks and opportunities, to reduce carbon emissions across our projects.

Key Policies

- *Sustainability Policy*.
- *Net Zero Carbon (NZC) Policy*.

Accreditations

- *International Standard ISO 14001 (Environmental Management System)*.
- *Achilles Utilities Vendor Database (UVDB) Supplier*.

Human Rights and Modern Slavery

We are committed to respect the dignity and human rights of our people, and those of our third parties and communities potentially impacted by our projects. We take appropriate measures to ensure that our supply chain is not negatively impacted by modern slavery.

In practice, our commitments are to:

- Comply with applicable legislation and regulations – including the UK *Human Rights Act 1998* and *Modern Slavery Act (MSA) 2015*, and the US *Trafficking Victims Protection Act (TVPA)* of 2000.
- Publish an annual *Modern Slavery Act Statement.*
- Identify, assess and mitigate any human rights and modern slavery risks which may arise from our business operations.
- Endeavour to meet the internationally recognised human rights and modern slavery standards across our business and supply chain.
- Be alert to human rights and modern slavery issues which may impact our third parties.
- Provide appropriate awareness training.
- Promptly take appropriate action to address any human rights and modern slavery issues which come to our attention.
- Expect third parties to share our commitment to human rights and modern slavery and, where necessary, leverage our business relationship to advance best practices.

Key Policies

- *Modern Slavery Act Statement*.

Appendix 1

Ethics & Compliance (E&C) Programme

Ethics & Compliance (E&C) Programme

KEY ELEMENTS OF AN EFFECTIVE ETHICS & COMPLIANCE (E&C) PROGRAMME

A framework of systems and procedures for helping an organisation (and its workers) to comply with applicable laws, regulations and company policies, standards, rules and procedures.

PREVENTION

Steps designed to **mitigate risks and prevent non-compliance.**

DETECTION

Steps designed to **discover non-compliance when it occurs.**

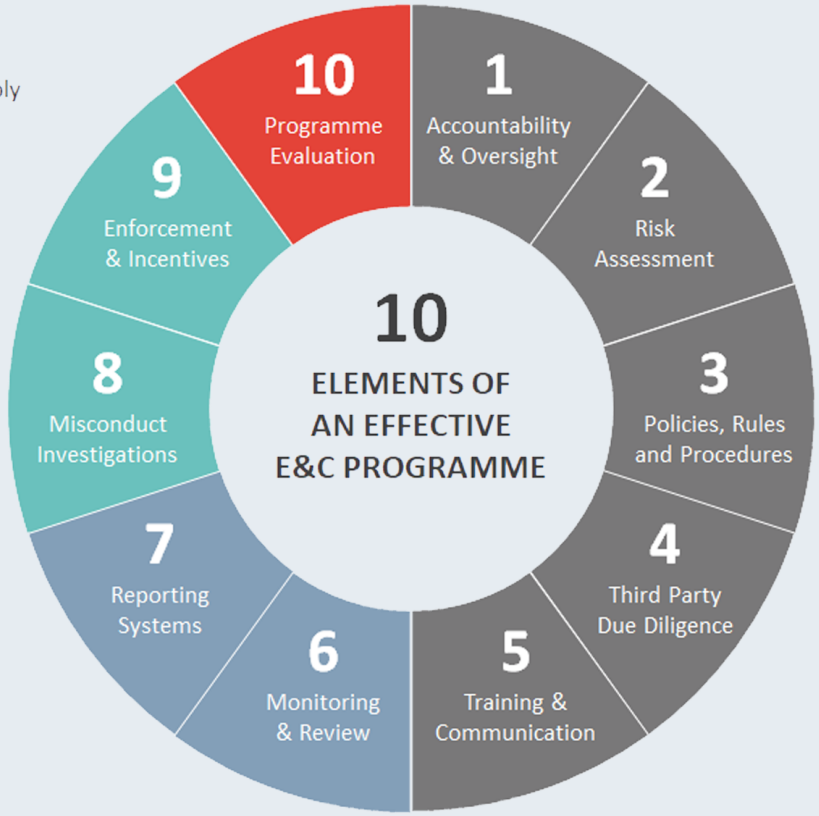
Continual Improvement

EVALUATION

Steps designed to **evaluate programme effectiveness, including an independent assessment.**

RESPONSE

Steps designed to **take corrective action and remedy harm caused by non-compliance.**



Appendix 2

G&T Policies

G&T Policies

The policies listed are referenced within *Our Code*, but do not represent an exhaustive list of all G&T's policies.

Key Policies

- *Our Code*.

- *Anti-bribery Policy & Related Business Rules*
- *Acceptable Use Policy.*
- *Anti-fraud Policy*.
- *Anti-harassment Policy*.
- *Anti-tax Evasion Policy*.
- *Artificial Intelligence (AI) Policy*.
- *Complaints Handling Procedure*.
- *Conflicts of Interest Policy*.
- *Copyright Policy.*
- *Data Classification & Handling Policy*.
- *Data & Document Disposition Policy*.
- *Data & Document Retention Policy*.
- *Data Protection Policy*.
- *Due Diligence, Money Laundering & Sanctions Policy*.
- *Employee-generated Volunteering (EGV) Policy.*
- *Equality, Diversity & Inclusion (EDI) Policy*.
- *External Communications Policy*.
- *Health & Safety Policy*.
- *Information Technology (IT) Communication System Policy*.
- *Information Security Policy*.
- *Modern Slavery Act Statement*.
- *Net Zero Carbon (NZC) Policy*.
- *Privacy Notice*.
- *Quality Policy Statement*.
- *Social Media Policy*.
- *Social Value Policy*.
- *Whistleblowing Policy*.
- *Sustainability Policy*.
- *Third-party Code of Conduct*.

Appendix 3

Useful Definitions

Useful Definitions

Terms used within *Our Code*

Term	Definition
Anti-boycott laws	Typically refer to US laws which prohibit US individuals and entities from complying with unsanctioned foreign boycotts (such as by the Arab League boycott of Israel). These laws aim to prevent US participation in economic and discriminatory boycotts used by foreign nations that conflict with US policy, by prohibiting US individuals and entities from agreeing to refuse to do business with a boycotted country or blacklisted entity. Foreign boycotts may be deemed by the US to be discriminating based on race, religion, sex, or national origin.
Artificial Intelligence (AI):	Computing technology that behaves in a human-like way and can perform tasks normally requiring human intelligence – such as speech recognition, visual perception, decision-making, and content-generation. For example, there are AI-powered technologies behind content-generating chatbots such as ChatGPT, Gemini, and Microsoft Copilot. There are also an increasing number of other forms of AI available.
Bribery	An offer or payment of anything of value (such as money, gifts, hospitality, entertainment, services, employment, or favours), intended to influence the recipient to misuse their position for dishonest or illegal purposes. Bribery is a form of corruption.
Bullying	Repeated behaviour directed towards a person or group of people that a reasonable person, having considered the circumstances, may deem as unreasonable. Such behaviour might include mocking, humiliating, intimidating, threatening, victimising, or sharing of offensive material.
Competition (Antitrust) Law	Legal frameworks of laws and regulations designed to promote fair market competition, protect consumer interests, and prevent anti-competitive practices. Also known as antitrust law, prohibited practices include restrictive agreements (such as cartels), abuse of dominant market positions, market-sharing, price-fixing, bid-rigging, and mergers that substantially lessen competition. The aim is to maintain a competitive and efficient marketplace, to protect consumers from high prices, low quality, and reduced choice.
Conflict of Interest (COI)	A situation where a personal relationship, interest or activity actually or potentially interferes with the ability of the Firm's and/or client's people to act objectively and impartially, in the best interests of the Firm or our clients, or where it could be reasonably perceived to interfere. Situations which could create a conflict of interest include (but are not limited to): ▪ Close relationships: Working with family members or relatives, or having a close personal reporting relationship (directly or indirectly) in the work environment. ▪ Business relationships: Working with people from our clients, competitors and third parties with whom there is a personal relationship. ▪ Business interests: Holding directorships or other interests (financial or ownership) in our clients, competitors or third parties. ▪ Outside activities: Employment or other external activities that could improperly influence professional duties for G&T. ▪ Benefits: Gifts, hospitality or anything of value, which could improperly influence professional duties for G&T.

Useful Definitions

Terms used within *Our Code*
(continued)

Term	Definition
Corruption	Any form of dishonest or illegal behaviour by a person in a position of authority, for the benefit of personal gain.
Data protection	Methods by which personal or corporate data is protected against being wrongly used or made public.
Discrimination	A situation where a person or group of people is treated differently (typically less favourably) than another person or group of people. The treatment might be based upon a personal or protected characteristic – such as disability, age, sex, origin, race, ethnicity, sexual orientation, religion, political opinion, pregnancy, breastfeeding, family responsibilities, experience of domestic violence, partnership status (marital or civil), intersex status, gender reassignment status, or transgender status.
Due Diligence (DD)	The process of undertaking proportionate, risk-based checks on clients, third parties, and business relationships. The objectives are to verify their identity and ultimate beneficial owner (UBO), and identify potential risks related to ethical and compliant conduct, to assess whether they should be a suitable a business partner.
Equality, Diversity and Inclusion (EDI)	The concept that all people should have equal rights and treatment and should be welcomed and included. In the US, D&I is often referred to as diversity, equality and inclusion (DEI).
Ethics & Compliance (E&C) Programme	A framework of systems and procedures for helping an organisation (and its people) to comply with applicable laws, regulations and company policies, standards, rules and procedures.
Facilitation Payment	Any payment (irrespective of value) made to a public official, to expedite performance of a routine government service or duty which they are obliged to perform, where the payment does not reflect an official published tariff for the expedited service. Examples of such services include issuance of visas or work orders; issuance of licences or permits; provision of utility services; or provision of customs clearances. In some countries, facilitation payments might be referred to as 'grease payments'.
Family Member	For the purposes of Our Code, this includes anyone who is connected to one of our people by way of a blood relationship, adoption, residence in the same household, or through having a close personal relationship.
Fraud	The act of engaging in deceptive or intentionally misleading activity, to obtain an unfair or illegal gain. Fraud offences include theft, forgery, misrepresentation, false accounting, abuse of position, obtaining services dishonestly, failure to disclose information, payment of false claims, and cheating the public revenue. This would include intentionally providing inaccurate statements in reports, questionnaires or bids; misrepresenting our project or sector experience; omitting key information; inflating time records; using unlicensed materials; or submitting misleading financial data.
Gifts and Hospitality (G&H)	Any goods, food, drink, travel, accommodation, entertainment, events, tickets, awards, employment, loans, preferential terms, or anything of value. These items might have tangible or intangible benefits, and can include in-kind contributions such as the use of assets or the provision of services.

Useful Definitions

Terms used within *Our Code*
(continued)

Term	Definition
Harassment	Behaviour or conduct from one person towards another person which is unwelcome. Such behaviour or conduct might create an intimidating, hostile, degrading, humiliating, or offensive environment for the recipient. Specific harassment might include: ▪ Gender-based harassment: Offensive behaviour based on gender such as bullying (non-sexual), exclusion, and stereotyping. ▪ Racial harassment: A racial slur, joke, comment, image, or unwelcome conduct based on race, descent, ancestry, ethnicity, ethnic origin, nationality, national origin, country of origin, colour, immigration status, or sharing of offensive material. ▪ Sexual harassment: An unwelcome sexual advance, request for sexual favours, or other conduct of a sexual nature, which makes the recipient feel offended.
Human Rights	The basic universal rights to which every person is entitled – including civil, social, labour, cultural, economic, political, and freedom rights.
Kickback	A covert payment (often part of a fee, remuneration or contract value) which is given or returned to someone who improperly influenced the award of new business, a contract, or favourable treatment in a transaction. The kickback might be paid as funds, or in the form of anything of value such as a business advantage. It is a form of bribery and is illegal.
Government Entity	A government, government body, or government department. It also includes public international organisations (such as the United Nations), State-owned Entities, and every employee of State-owned Entities (regardless of title, rank or role, or how the employee is characterised by local law). It also includes US Federal and State organisations which provide public services.
Inside information	Precise, non-public, and material information relating to a public company's securities (such as stocks or bonds) which, if made public, would be likely to significantly affect the price of those securities. It is typically confidential and price-sensitive information, which is used to make investment decisions. Misuse of this information for unfair advantage and financial gain on the global stock markets is referred to as insider trading.
Insider Trading	The buying or selling of a public company's securities (such as stocks or bonds), while in possession of precise, non-public, and material information about that company. It is illegal in many jurisdictions, because it provides an unfair advantage over other investors, and undermines market integrity.
Intellectual Property (IP)	A category of property encompassing intangible creations of the human intellect – such as inventions, literary/artistic works, designs, symbols, and names used in commerce. It provides creators with exclusive rights to their works (often through patents, copyrights, and trademarks), allowing them to prevent unauthorised use and derive financial benefit.
Modern Slavery	The control and exploitation of a person for profit or gain. It might take many forms involving coercion, deception or force. It might involve practices such as forced labour, human trafficking, debt bondage, domestic servitude, forced marriage, and criminal exploitation. Typically, individuals who are victims of modern slavery are stripped of their freedom and treated as commodities. It is common in sectors such as agriculture, manufacturing, and private homes.

Useful Definitions

Terms used within *Our Code*
(continued)

Term	Definition
Money laundering	The process of hiding, disguising, moving or converting the proceeds of crime into assets (such as cash, property, or commodities), so that they appear to originate from a legitimate source.
Money laundering regulations	Legal frameworks of laws and regulations which require regulated sectors to implement risk-based controls, conduct client due diligence, monitor transactions, report suspicious activity, and maintain a corporate compliance programme.
Net Zero Carbon (NZC)	The global state of 'net zero' would occur when the amount of greenhouse gases (such as Carbon Dioxide) which is added to atmosphere by human activities balances, or is no longer more than, what is taken out (such as by absorption, durable storage by nature, and by other Carbon Dioxide removal measures), leaving zero in the atmosphere. This state would be expected to significantly slow down global warming and climate change, although the effects of existing atmospheric greenhouse gases would still contribute to continued warming.
Our People	G&T employees, Partners, and any workers who have a contractual relationship with the Firm – including temporary workers, work experience students/interns, and volunteers – within any entity owned and operated by G&T worldwide.
Outside Assistant (OA)	A type of G&T third party which is an individual (often a sole trader) or entity (such as a registered company) external to the Firm, that is engaged on a short-term and/or temporary basis to assist the delivery of the Firm's professional services. OAs may provide specialist, technical, operational, or advisory support. They may interact with clients, regulators, or other third parties on the Firm's behalf, under the Firm's direction and oversight.
Personal Information	Any information or data relating to an identified or identifiable living individual. Also known as personally identifiable information (PII). It includes direct identifiers – such as names and identification numbers. It also includes indirect identifiers - such as location data, internet protocol addresses, and factors reflecting a person's physical, genetic, or social identity. These identifiers, when alone or in combination with other information, could be used to identify, contact, or locate a specific person.
Politically Exposed Person (PEP)	Individuals (and family members of such individuals) entrusted with prominent public functions, of any country or international organisation. This includes heads of state or government; senior politicians; senior governmental, judicial, or military officials; senior executives of state-owned corporations; directors, deputy directors, and members of the board (or equivalent functions) within international organisations. PEPs who relinquish office (or their relatives who cease being family members, such as through divorce) are no longer treated as PEPs after a 12-month period.
Privacy Laws	Laws and regulations (such as the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018) that govern how personal information is collected, stored, used, disclosed, and retained. These laws protect the fundamental rights of individuals to privacy and ensure that their personal data is handled only for appropriate, ethical, legal, and authorised business purposes.

Useful Definitions

Terms used within *Our Code*
(continued)

Term	Definition
Public Official (PO)	This includes anyone employed by a Government Entity, State-owned Entity, political party, legislature, or public international organisation (such as the United Nations).
Sanctions	Laws, regulations and compulsory measures enacted by government authorities (such as the US, UK and European Union) and supranational organisations (such as the United Nations). Sanctions are enacted to restrict (sanction) or prohibit (impose a ban or embargo) organisations from doing business with specific targets – which could be countries, territories, individuals, groups, regimes, entities, industries, vessels, and aircraft. The aim of sanctions is to endeavour to impose economic pressure, to drive a change in the behaviour of the target.
Speak Up	The obligation to immediately raise concerns or report suspicions of potential misconduct, breaches of Our Code, or unethical or illegal behaviour.
State-owned Entity (SOE)	A state-owned or state-controlled commercial entity, over which a Government Entity exercises substantial control (even if not wholly owns), and is therefore deemed to be a government instrument.
Tax Evasion	The illegal underpayment or non-payment of tax.
Terrorism Financing	The act of providing, collecting or managing funds (from legitimate or illegitimate sources) with the intention or knowledge that they will be used to support terrorist acts, individuals or organisations. Unlike money laundering, which hides the illegal origin of funds, terrorist financing typically focuses on concealing the destination and purpose of the money.
Third Parties	Any individual or entity external to G&T that has a contractual relationship with the Firm and works with, or on behalf of, G&T – including those parties supplying goods or services to the Firm. This includes (but is not limited to) the following: subconsultants, subcontractors, outside assistants (OAs), suppliers, contractors, service providers, agents, advisors, and business and joint venture partners. It also includes employees and other workers (whether paid or unpaid) of these entities.
Trade controls	Restrictions imposed by government authorities or supranational organisations against certain countries, individuals, and entities. Examples of trade controls include import restrictions, export restrictions, and anti-boycott laws.
Ultimate Beneficial Owner (UBO)	Any natural person (rather than a legal entity) who ultimately owns or controls (directly or indirectly) 25% or more of the shares, voting rights, ownership interest, or otherwise exercises control over the entity.

This *Code of Conduct* has been endorsed by G&T's Managing Partner and the Management Board.
Any printed, downloaded, or locally saved copy of this policy is deemed as an uncontrolled document, and may not represent the latest version.
Users should refer to the controlled version, which is maintained electronically on G&T's corporate website and internal intranet.