

GARDINER & THEOBALD

MODERN SLAVERY ACT STATEMENT

Year Ending 31 March 2026

KEY INFORMATION

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1. INTRODUCTION

Gardiner & Theobald (G&T) provides a wide range of professional construction consultancy and related professional services. This *Modern Slavery Act Statement* (the '*Statement*') sets out G&T's commitment and actions taken to comply with the *Modern Slavery Act (MSA) 2015* (and specifically, *Section 54 – Transparency in Supply Chains*) during the financial year ending 31 March 2026.

2. ORGANISATIONAL STRUCTURE, COUNTRIES OF OPERATION AND SUPPLY CHAINS

G&T is a limited liability partnership registered at Companies' House under the Company Registration number OC307124, and is headquartered in London.

3. PROCESS

Organisations that provide goods or services to G&T are subject to appropriate due diligence. They are required to confirm whether they, and their own supply chains, are free from modern slavery (which may also be referred to as human trafficking).

4. HIGH-RISK ACTIVITIES

The following activities are considered to be potentially at risk of modern slavery, and this list will be reviewed and updated annually:

- **Materials:** Provision of materials supplied to G&T (such as marketing materials), which may be produced in a jurisdiction or by organisations that are not compliant with the *MSA 2015*.
- **Staff:** Use of staff by suppliers to G&T, where the supplier's processes may not be compliant with the *MSA 2015*.
- **Third parties:** Employment of sub-consultants, suppliers and sub-contractors by G&T, where their work practices may not be compliant with the *MSA 2015*.

5. RESPONSIBILITY

Responsibility for G&T's anti-slavery initiatives is as follows:

- **Statement:** The *Statement* has been drafted by key personnel, and has been endorsed by G&T's Managing Partner and Management Board.
- **Investigations:** G&T has included specific questions in its due diligence enquiries for new and existing sub-consultants, suppliers, and sub-contractors.
- **Training:** A training programme is available to ensure understanding of modern slavery. The internet-based training resource is available for all of the G&T Group, both in the UK and overseas and, where necessary, appropriate sub-consultants, suppliers and sub-contractors.
- **Right to Work:** G&T uses an identity validation scanner to verify the validity of staff identification documents, and establish their legal right to work in the UK.

6. RELEVANT POLICIES

G&T has implemented the following relevant policies:

- **Code of Conduct (Our Code):** *Our Code* reflects our mission and values, by setting 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). Ultimately, it ensures that we continue to act with integrity, build trust, and uphold the standards that define the Firm.
- **Third-party Code of Conduct (Third-party Code):** Our *Third-party Code* sets out an overview of our expectations for our third parties to share G&T's commitment to high ethical standards and compliance with legal requirements. It is not intended to represent an exhaustive list of legislation, regulations, or requirements applicable to our third parties.
- **Anti-bribery Policy & Related Business Rules:** This *Policy* helps to ensure that the Firm conducts all business fairly, honestly, openly, and with integrity, while maintaining a zero-tolerance approach to bribery and corruption.
- **Whistleblowing Policy:** This *Policy* encourages reporting of any misconduct concerns, including concerns related to the direct activities or the supply chains of G&T. This *Policy* is designed to make it easy for staff to make disclosures, without fear of retaliation. Employees, sub-consultants, suppliers, sub-contractors, clients or other associated third parties who have concerns may contact G&T's Managing Partner or Human Resources Partner directly, or may make a confidential disclosure.
- **Recruitment Procedure:** G&T uses specified, reputable employment agencies to source staff.
- **Social Value Policy:** G&T's core values are independence, reputation, progression, ethical thinking and engagement.

7. DUE DILIGENCE

G&T undertakes appropriate due diligence with new suppliers, and regularly reviews its existing suppliers.

8. PERFORMANCE INDICATORS

G&T has:

- Developed a system for supply chain verification. Since circa February 2016, G&T has evaluated appropriate potential suppliers before they enter the supply chain.
- Been reviewing its existing supply chains periodically.

9. TRAINING AND AWARENESS

G&T has in place an online training module introduced in October 2016, which it offers to staff within the organisation (and appropriate suppliers).

The training covers

- What the *MSA 2015* means to individuals.
- What is expected of employees with regards to looking out for, and reporting, victims of modern-day slavery.
- How to report suspected cases of modern-day slavery.

10. BOARD APPROVAL

This *Statement* covers the G&T financial year ending 31 March 2026, and has been endorsed by G&T's Managing Partner and Management Board. It will be reviewed and updated at least annually.



18 August 2026



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This Policy has been endorsed by G&T's Managing Partner and the Management Board.