Hammerson plc

2022 Slavery and Human Trafficking Statement

Our annual Slavery and Human Trafficking statement is made pursuant to the UK Modern Slavery Act 2015 (the "Modern Slavery Act"). The statement sets out the approach taken by Hammerson plc ("Hammerson") to understand the potential modern slavery risks related to its business and its wider group[1] (the "Group"), and explains the actions taken to prevent slavery and human trafficking within the Group's business operations and supply chains. It is made with respect to the financial year ended 31 December 2022 and signed by a director of Hammerson plc, the Group's ultimate controlling party.

Policy and principles

Hammerson is committed to complying with its obligations under the Modern Slavery Act and other relevant legislation relating to the detection and prevention of modern slavery and human trafficking. It is committed to implementing appropriate controls that seek to ensure that modern slavery is not taking place in its business or supply chains.

Consistent with its obligations under the Modern Slavery Act, the Group is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery in its supply chains. Hammerson expects the same standards from its contractors, suppliers and other business partners.

Our business and supply chains

At Hammerson, we are an owner, operator and developer of sustainable prime urban real estate. At the date of this statement, our portfolio includes investments in 12 flagship destinations in the UK, France and Ireland; and nine premium outlets across Europe through our partnership with Value Retail. We are a responsible property owner, manager and developer and have a vision and strategy for ESG to create exceptional destinations that connect communities, delivering positive impact for generations to come.

Risk management

The Board is responsible for the Group's risk management, which is explained further in our 2022 Annual Report with more detailed sustainability and socio-economic related risks being included in our separate 2022 ESG Report.

Our risk management policies and procedures provide a robust foundation for identifying risks, including emerging risks, assessing mitigating factors and actions and establishing clear management responsibility. Using the Group's risk management framework, the Board regularly assesses the Group's residual risks in the context of its risk appetite.

From a slavery and human trafficking perspective, our key risk areas are within our supply chain and relate to construction activities and support services such as cleaning and maintenance. In 2022, the residual risk in both these areas remained low

[1] See pages 184 to 188 of the Hammerson Plc 2022 Annual Report for a full list of entities in the Hammerson Group.

Our supply chain policies

We have a Responsible Procurement Policy which demands that businesses in our supply chain comply with all applicable laws and a Supplier Code of Conduct. This code sets the minimum labour standards we expect our suppliers to meet. These include legal minimums and international standards on the employment of compulsory, child and illegal labour, discrimination, pay, working conditions and bribery and corruption. It also sets objectives we are working towards with our supply chain partners. All suppliers must accept the standards we have set out in the code of conduct to be able to work with us.

As explained above our key supply chain risks are at an operational level and we have identified a number of key suppliers who provide portfolio-wide services including cleaning, maintenance, project management, telecommunications and IT. These services are often labour intensive, can involve low-skilled workers and may also be carried out by subcontractors which can reduce visibility within our supply chain.

In February 2023, we consolidated the property management service across our UK portfolio with a single supplier, Jones Lang LaSalle Limited. Considerations relating to the risk of modern slavery and human trafficking were an important focus, including as part of our due diligence and in ensuring that contractual terms reflected appropriate compliance requirements.

We continued to work with our key facilities management suppliers to enable them to pay their employees' wages at levels at least at the National Living Wage in the UK and in line with sector specific Employment Regulation Orders in Ireland and the SMIC in France. Contracts with these suppliers include clauses explicitly stating that they will comply with anti-slavery laws and not engage in any slavery or human trafficking practices. We also require suppliers to notify us of any potential breaches of which they become aware and details of how to raise a concern are included in our Supplier Code of Conduct.

We take our responsibilities to our suppliers seriously and are a signatory to the UK Government's Prompt Payment Code and have due regard to the RICS Professional Statement when managing service charges.

Our people

Hammerson is an equal opportunities employer and does not discriminate between local and migrant employees. At 31 December 2022, we directly employed 320 people across the Group. We expect our employees to operate in line with our Code of Conduct which requires employees to treat other people with respect and to comply with all laws and regulations.

We also have a Whistleblowing Policy under which employees are encouraged to report any suspected wrongdoing. We have a number of different ways in which employees can make reports in confidence and, if they wish, anonymously. During 2022, no concerns were raised using the whistleblowing facility and no other issues were raised that have been treated as whistleblowing, whether in relation to modern slavery, human trafficking or other issues. If any concerns relating to modern slavery or human trafficking were raised, we would investigate thoroughly.

The Company also has in place a colleague "Forum" to provide additional engagement between the leadership team and colleagues, including how the Company operates.

We continue to ensure modern slavery awareness is maintained across our operational teams, including how to report any issues and have modern slavery and human trafficking training available on our online training system.

Effectiveness measured against performance indicators

Our 2022 Annual Report and ESG Report both include information on how we delivered positive economic, social and environmental impacts. While we do not use key performance indicators specifically for slavery or human trafficking, we believe that our policies, practices and actions have been effective in preventing slavery and human trafficking as no incidents were identified or alleged in 2022. As explained in our previous statements, we have enhanced a number of our policies and procedures in this area over recent years, and continue to look at further measures in 2023.

Conclusion and approval

We continue to conduct our business affairs to a high standard of integrity, honesty and transparency. This includes working to ensure that slavery and human trafficking do not exist in our supply chains and work places. We review our effectiveness in this area each year and produce an updated annual statement explaining changes and progress during the previous year having regard to new risks which may be identified.

The Modern Slavery Act requires large entities (being those with a turnover of £36 million or more) carrying on business in the UK to publish such a statement. This statement covers Hammerson plc, Hammerson Group Management Limited, Brent Cross Partnership and The Bull Ring Limited Partnership. It has been approved by the Board of Directors of Hammerson plc and Hammerson Group Management Limited, the Committee of Brent Cross Partnership and the Board of Directors of the General Partner of The Bull Ring Limited Partnership. The statement is signed by a director of Hammerson plc, the holding company of the Hammerson Group.



Rita-Rose Gagné

Chief Executive

28 June 2023