HAMMERSON

HAMMERSON PLC

Slavery and Human Trafficking

For the year ended 31 December 2025

Slavery and Human Trafficking

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 2025 and approved by the Board 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 operating appropriate controls that are designed 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

Hammerson is a UK Real Estate Investment Trust listed on the London Stock Exchange in the FTSE 250.

We invest in and manage prime retail-led city destinations in the UK, France and Ireland. At the date of this statement, our portfolio includes investments in 10 flagship destinations and c. 70 acres of strategic land.

Some of our destinations are co-owned with third parties where the Group provides a range of asset management, development, corporate and financial services, and for which we earn management fees. All of these co-ownership arrangements operate in line with Hammerson policies.

Our supply chains primarily relate to property management, construction and development activities, and corporate services. They involve a mix of direct suppliers and subcontractors operating across multiple geographies.

Risk management

The Hammerson Board is responsible for the Group's risk management, which is explained further in our Annual Report 2025.

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.

Our assessment of modern slavery risk considers factors such as labour intensity, use of subcontracting, geographic exposure and the nature of services provided. Our key risk areas are within our operations and include construction activities and facilities management support services.

---

[1] See pages 218 to 220 of the Hammerson plc 2025 Annual Report for a full list of entities in the Hammerson Group.

In 2025, no instances of modern slavery were identified and the residual risk in relation to slavery and human trafficking remained low.

Our supply chain policies

We have a Responsible Procurement Policy which requires businesses in our supply chain to comply with all applicable laws and our Supplier Code of Conduct ('our Supplier Code'). 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 our Supplier Code to be able to work with us. We also have in place a Human Rights Policy, which underlines our commitment to ensuring that all our business activity is conducted in way that respects the rights and dignity of everyone we interact with and is in compliance with applicable legal requirements.

As explained above, our key supply chain risks are at an operational level and we have identified several key suppliers who provide portfolio-wide services including facilities management, construction activities and IT. These services are often labour intensive, can involve workers in lower-wage roles and may also be carried out by subcontractors, which can reduce visibility within our supply chain.

In conjunction with our specialist external property managers, we continue 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. Where appropriate, contracts with our suppliers include clauses mandating compliance with all applicable anti-slavery laws and prohibiting any involvement in human trafficking practices. This commitment is further reinforced through our Supplier Code. During the life of our relationship with key suppliers, we periodically ask them to confirm ongoing compliance with relevant regulatory matters, the existence of appropriate policies and training. These checks will be refreshed during 2026.

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 2025, we directly employed 124 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 applicable laws and regulations.

The Company also has in place a colleague forum to provide additional engagement between the leadership team and colleagues, including on matters relating to how Hammerson operates, and has an active colleague-led Affinity Network which champions equality, diversity and inclusion across the Group.

We continue to ensure modern slavery awareness is maintained across our operational teams, including how to report any issues. Modern slavery awareness training is available to relevant employees to ensure they understand risk indicators and how to escalate any concerns.

We also have a Whistleblowing Policy under which employees are encouraged to report any suspected wrongdoing. We have several different ways in which employees can make reports in confidence and, if they wish, anonymously. If any concerns relating to modern slavery or human trafficking were raised, we would investigate thoroughly. During 2025, there were no incidences of whistleblowing in relation to modern slavery, human trafficking or other related matters.

Effectiveness measured against performance indicators

The Group uses a number of key performance indicators to monitor the performance of the business, and these are published in both the Annual Report 2025 and separate ESG Report 2025. While we do not use specific key performance indicators for slavery or human trafficking, we believe that our policies, practices and actions continue to be effective in preventing slavery and human trafficking with no incidents identified or alleged in 2025.

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 workplaces. 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 organisations (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, The West Quay Limited, Brent Cross Partnership and The Bull Ring Limited Partnership. It has been approved by the Boards of Directors of Hammerson plc and Hammerson Group Management Limited, the Boards of Directors of the General Partners of The West Quay Limited Partnership and The Bull Ring Limited Partnership, and the Committee of Brent Cross Partnership. The statement is signed by a director of Hammerson plc, the ultimate controlling party of the Hammerson Group.

Approved by the Hammerson plc Board on 24 June 2026 and signed on its behalf by

Rob Wilkinson, Chief Executive
24 June 2026