

Positive Places

Supplier Code of Conduct

In 2009, Hammerson launched a responsible procurement policy to improve our engagement with you, our suppliers, and, as a result, improve our joint performance. This document is one of the products of that policy.

The Code of Conduct, and the accompanying questionnaire, helps us understand your organisation better, while also improving your understanding of our commitment to responsible procurement.

The Code of Conduct (The Code) outlines a set of 'best practice' standards that apply to all our suppliers. This is not a contractual document, but we, as Hammerson, ask you, as one of our suppliers, to review and subscribe to its contents. The standards cover the following areas:

- Legal requirements
- Labour standards
- Health and Safety
- Environmental responsibility

This document also describes how we will measure and monitor supplier adherence to the Code.

By subscribing to the Code and continuing to meet its standards, we'll be able to judge your organisation as 'responsible'. We'll work with you to identify best practice, and we'll promote companies that demonstrate leadership. Contact us if you are concerned about non-compliance - we are committed to helping suppliers to adhere to the Code, wherever practicable.

Preamble

Hammerson is widely recognised both amongst our sector peers and the wider business universe for its sustainability performance. We are engaged and active on sustainability issues including environmental protection, social impact, employee welfare and the fight against corruption.

Our sustainability strategy, Positive Places, sets out our vision to deliver retail destinations that deliver net positive impacts economically, socially and environmentally.

As a supplier to Hammerson, you are integral to the delivery of this vision. We are taking a proactive approach towards purchasing by encouraging our suppliers also to achieve high social and environmental standards. We are working closely with you to achieve this. By working together on sustainability today, we can build ambitious relationships that last.

This Code of Conduct explains what we require of your organisation, your subcontractors and any other business partners. The Code is approved by Hammerson's CR Board. By adopting

this Code, you, as a supplier, agree to abide by and implement all the principles it contains, and to ensure that your contractors do the same, according to the prevailing national legislation.

The Code's requirements are based on the principles of The Universal Declaration of Human Rights, The UN Convention on the Rights of the Child, ILO (International Labour Organization) Conventions, and national legislation.

If there is a valid reason why your organisation is unable to adhere with any aspect of the Code, please inform us as soon as possible. We can then agree on the appropriate corrective measures. The principles and requirements of Hammerson's Code of Conduct are described and explained under the headings which follow.

Business Integrity and Legal Requirements

Hammerson is committed to the highest standards of business integrity and seeks to conduct business with Suppliers whose ethical standards are consistent with Hammerson's. Hammerson's own ethical standards are embodied in their Employee Code of Conduct, which has been prepared to help staff fulfil their personal responsibilities in this respect. A summary of the main points of the Employee Code of Conduct are available on Hammerson's website at www.hammerson.com.

Hammerson expects that their Suppliers will work in accordance with the same high standards and that the Supplier has an Employee Code of Conduct which has been issued to all staff and whose provisions are similar to those contained in the Hammerson Employee Code of Conduct.

Hammerson is committed to comply with all laws and regulations and, to the extent that they set a higher and an appropriate standard, to codes of practice and guidance.

Hammerson wishes to bring the following specific issues to the attention of Suppliers:

- Hammerson has committed to prevent bribery in all parts of its business. Hammerson trusts and requires that its Suppliers share this commitment. Any breach of applicable laws will lead to the termination of the relationship with a Supplier. In the UK, the Bribery Act came in to force in 2011 and Hammerson expects all Suppliers to have in place adequate procedures to prevent a bribe being paid on behalf of an organisation.
- Hammerson does not tolerate unfair practices to compete for and win business and expects that its Suppliers will make purchasing decisions objectively based on price, delivery, quality and other relevant Factors.

Raising a concern

Hammerson takes its corporate responsibility very seriously and would urge any individual (or supplier) that suspects any wrongdoing, and has evidence to corroborate it, to report it to Hammerson via our whistleblowing mechanisms.

Concerns can be raised by:

- Calling: General Counsel and Company Secretary +44 (0)20 7887 1000
- Emailing: whistleblowing@hammerson.com
- Writing: General Counsel and Company Secretary Hammerson plc Kings Place, 90 York Way London N1 9GE Please mark your envelope "Addressee Only"

Compliance with labour standards Workers' Rights

Every employee should be treated with respect and dignity. Our suppliers, their subcontractors and their business partners are strictly banned from resorting to humiliating employees or using corporal punishment, and no employee shall be subject to physical, psychological or verbal harassment.

In accordance with ILO (International Labour Organization) Conventions 87, 98 and 135, all employees have the right to form or join associations of their own choosing and to bargain collectively. Any disciplinary or discriminatory actions by the employer against employees who choose to peacefully and lawfully organise or join an association will not be accepted by Hammerson.

All employees must have a written contract, in their local language, stipulating their employment terms and conditions.

Migrant employees should have exactly the same rights as local employees. All commissions and other fees linked to migrant worker employment must be covered by the employer. Hammerson does not accept any form of corruption from the employer against migrant workers or local employees. Migrant workers are covered by this Code.

Workers employed through an external contractor fall under the responsibility of the Supplier, and are covered by this Code.

Use of forced or compulsory labour

In accordance with ILO Conventions 29 and 105, we do not accept any forms of forced or compulsory labour, including the use of prison labour in the production of services for Hammerson.

Use of illegal labour

The Supplier will not use illegal labour as defined by national law.

Child Labour

Hammerson will not tolerate the use of child labour. We acknowledge that, according to the UN Convention on the Rights of the Child, a person is a child until the age of 18. We

recognise the rights of every child to be protected from economic exploitation or from performing any work that is likely to be hazardous, to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.

The Supplier undertakes to apply all law relating to the elimination of child labour and to protect children as defined by national legislation, or, if none exists, by ILO Conventions. No person below the age of 16 (compulsory school leaving age) should be employed by a supplier.

Discrimination

In accordance with ILO Conventions 100 and 111, no employee shall be discriminated against in employment or occupation on the grounds of sex, race, colour, age, pregnancy, sexual orientation, religion, political opinion, nationality, ethnic origin, disease or disability. The Supplier must also comply with legislation relating to employees with disabilities.

Working Time

The Supplier has to comply with national legislation on working time.

Working hours must not exceed the legal limit, with all employers taking appropriate action to ensure a good level of work life balance.

Employees should be granted and correctly compensated for any types of paid leave to which they are legally entitled.

Pay

"Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity..." (The Universal Declaration of Human Rights - Article 23:3)

The Supplier will comply with local legislation on minimum wages and undertake to pay employee wages regularly.

According to UK national legislation (2005), the minimum wage is a legal right, covering the majority of workers above the compulsory school-leaving age.

Suppliers must comply with national minimum wage rates, and with every change to these rates that may occur in the future.