



HAMMERSON

HAMMERSON PLC

Slavery and Human Trafficking

For the year ended 31 December 2024



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 group¹ (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 2024 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 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 are an owner, operator and developer of sustainable prime urban real estate. At the date of this statement, our portfolio includes investments in 10 flagship destinations and c. 70 acres of strategic land in the UK, France and Ireland.

Some of our destinations are in joint ventures where the Group provides a range of asset management, development, corporate and financial services, and we earn performance and management fees. All our joint ventures operate in line with Hammerson policies.

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 [2024 Annual 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 2024, the residual risk in both these areas remained low.



Our supply chain policies

We have a [Responsible Procurement Policy](#) which demands that businesses in our supply chain 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.

Our key supply chain risks are at an operational level and we have identified several key suppliers who provide portfolio-wide services including cleaning, maintenance, project management 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 conjunction with our specialist 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.

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 2024, we directly employed 125 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 several different ways in which employees can make reports in confidence and, if they wish, anonymously. During 2024, 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 Hammerson operates and has an active colleague-led affinity group championing diversity across the Group.

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 2024 Annual Report and separate ESG Report ([available on our website](#)) both include information on the delivery against our strategy and the significant progress made over the last four years. 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 2024. 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 2025, including a review of our Supplier Code of Conduct and associated diligence procedures.

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 Partnership and The Bull Ring Limited Partnership. It has been approved by the Boards of Directors of Hammerson plc and Hammerson Group Management Limited, and the Boards of Directors of the General Partners of The West Quay Limited Partnership and 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 Officer
27 June 2025