



HAMMERSON

Hammerson Supplier Code of Conduct

| Section | Description |
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| Introduction | <p>Hammerson owns, manages and invests in landmark city destinations integrating retail, leisure and community hubs to meet evolving customer and occupier needs while delivering sustainable long-term growth for our stakeholders. Hammerson is committed to maintaining the highest standards of business integrity and seeks to work with Suppliers who share our commitment to ethical conduct. Our own ethical principles, including our approach to Anti-Bribery and Corruption, are embodied in our Employee Code of Conduct, which guide our colleagues in upholding these responsibilities.</p> <p>More information, along with our relevant policies, can be found on Hammerson’s website at www.hammerson.com.</p> <p>This Supplier Code of Conduct (the Code) outlines the obligations on all third parties who provide goods and / or services to Hammerson (Suppliers) and aims to promote safe and fair working conditions and the responsible handling of social, ethical and environmental issues in Hammerson’s supply chain and requires Suppliers to continuously comply with all applicable laws, regulations, and standards in all of the countries in which it operates.</p> <p>Hammerson recognises that smaller suppliers may have limited resources to fully meet every requirement outlined in this Code. In such cases, Suppliers are expected to raise any such issues proactively with Hammerson. Hammerson is then committed to working collaboratively with Suppliers to offer guidance and support, assisting them in implementing the principles and practices set forth herein, however, Suppliers must always maintain the legal standards and expectations of this Code at all times. All Suppliers (regardless of size or the nature of their relationship with Hammerson) must comply at all times with all applicable laws and regulations, including all requirements set out in the sections of the Code headed “Anti-Bribery and Corruption”, “Fraud Prevention, Anti-Money Laundering, Sanctions and Financial Crime”, “Labour Standards”, “Health and Safety” and “Data Privacy and Information Security”.</p> |



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| | <p>The term "Supplier" in this Code shall, where relevant, also include contractors, subcontractors and agents of the Supplier. All references to "Hammerson" include the relevant contracting entity and all other Hammerson group companies (the Group), including jointly owned entities where the underlying property asset is managed by the Group, that benefit from the goods and / or services being provided. The phrase "employee" relates to any person working on behalf of a Supplier, regardless of their employment status.</p> <p>The Code is approved and overseen by the Group Executive Committee of Hammerson plc. This Code also describes how we will monitor Supplier compliance and the remedial action we may require in the event of any failure to meet the standards.</p> <p>Suppliers who consistently adhere to this Code will be recognised as valued business partners. We are committed to supporting our Suppliers in upholding these principles and will work collaboratively to identify and implement best practices where possible. Adherence to the Code must be confirmed to Hammerson annually. Suppliers are required to provide written confirmation at least once per year that (a) they have appropriate systems in place to monitor compliance with this Code, and (b) they are able to maintain compliance throughout their relationship with Hammerson. This confirmation must be submitted digitally via the online form provided by Hammerson, or in another format as may be requested from time to time. In addition, Suppliers must provide any third-party or self-certifications reasonably requested by Hammerson within 30 days to demonstrate compliance with all applicable laws and frameworks.</p> <p>The Supplier acknowledges, agrees and assumes entire and sole responsibility for full compliance with this Code.</p> |
| Conflict of Interests and Corrective Action | <p>Suppliers are expected to monitor and appropriately mitigate any actual or potential conflicts of interest, whether at the corporate or individual level, arising in their work with Hammerson. Suppliers must also identify, correct, and monitor any activities that fall below the standards of this Code and use all reasonable efforts to ensure their supply chains comply with these standards.</p> <p>Any such conflicts or breach of this Code must be reported to Hammerson promptly, along with details of the actions taken to prevent recurrence and, together with Hammerson, agree a schedule for prompt remediation.</p> <p>A breach of this Code may be considered a material breach of contract and Hammerson accordingly reserves all its legal rights and remedies in respect of any such breach, including but not limited to termination of agreement(s).</p> |



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| | <p>Hammerson may monitor and / or report on Supplier's compliance and progress (or the extent thereof) with this Code and the Supplier agrees to such disclosure. To support this, Suppliers shall provide Hammerson with reasonable access to all relevant information, employees, and premises for the purpose of auditing compliance. Suppliers are also expected to use all reasonable endeavours to ensure their sub-tier suppliers provide similar access. Audits may be conducted by Hammerson, its representatives, or an independent third party acting on Hammerson's behalf. We expect these access rights to be reflected in supplier agreements to ensure full transparency across the supply chain.</p> |
| Anti-Bribery and Corruption | <p>Hammerson has a zero-tolerance approach to any type of bribery or corrupt business practices, including improper offers or payments to or from employees, customers, suppliers, organisations or individuals. Hammerson equally does not tolerate anti-competitive or unfair practices to compete for and win business and expects that its Suppliers will make their purchasing decisions objectively based on price, delivery, quality and other relevant factors.</p> <p>Hammerson trusts and requires that its Suppliers share this commitment, and require Suppliers to:</p> <ul style="list-style-type: none">• have an anti-bribery policy that sets out the principle of zero-tolerance to any form of bribery or corruption within their organisation, including facilitation payments;• comply with all applicable anti-bribery, anti-corruption, and tax laws in the UK, the country in which they operate, and any location where Hammerson requires the service and / or goods;• not give, promise, receive or request any bribes (financial or other advantage), including but not limited to relations with public officials;• ensure its employees, contractors and subcontractors are aware of its anti-bribery policy and how to comply with its requirements;• not engage in any activity, practice or conduct which would constitute either a UK or foreign tax evasion offence; and• have in place reasonable policies and procedures to prevent facilitation of tax evasion by another person (including its employees). |



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| Fraud Prevention, Anti-Money Laundering, Sanctions and Financial Crime | <p>Hammerson is committed to preventing fraud, money laundering, and economic crime in all its business dealings. Suppliers must share this commitment and implement effective controls to detect, prevent, and report any fraudulent or suspicious activities.</p> <p>Suppliers shall:</p> <ul style="list-style-type: none">• act in accordance with all applicable standards, laws and regulations relating to fraud, money laundering, economic crime, and corporate transparency in the jurisdictions where they operate (those relating to bribery, corruption, and money laundering, sanctions, or tax evasion facilitation);• not engage in, facilitate, or tolerate any form of fraud, money laundering, or economic crime, whether directly or indirectly;• not do or omit to do anything likely to cause any party to be in breach of any such standards and laws;• ensure transparency and accuracy in all corporate and beneficial ownership information as required by applicable laws; and• maintain effective anti-fraud and (where appropriate) anti-money laundering compliance processes, designed to ensure compliance with the law including the monitoring of compliance and detection / investigation of suspected violations. |
| Labour Standards | <p>This Code's requirements are based on, and are aligned with, the principles of The Universal Declaration of Human Rights, The UN Convention on the Rights of the Child, ILO (International Labour Organization) Conventions, and relevant national legislation, including the modern slavery legislation.</p> <p>Hammerson believes that every employee deserves to be treated with respect and dignity, in accordance with their human rights. We expect our Suppliers to share this commitment and to have processes in place to ensure compliance. This includes measures to ensure that:</p> <ul style="list-style-type: none">• all employees have the right to form or join associations of their choosing and bargain collectively• all employees have a written contract, in their local language, stipulating their employment terms and conditions• migrant employees have comparable rights as local employees• commissions and other fees linked to migrant worker employment is covered by the employer• there is no use of forced, prison, or slave labour in accordance with ILO Conventions 29 & 105• there is no use of child labour as defined by national legislation, or by ILO Conventions |



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| | <ul style="list-style-type: none">• no employee shall be discriminated against in employment or occupation on the grounds of race, colour, sexual orientation, religion, political opinion, national extraction, age, pregnancy, nationality, ethnic origin, disease, or disability• working hours do not exceed the international recognised limit (standards of 48 regular hours per week and a minimum of 24 hours rest every 7 days, as well as a maximum of 12 hours of voluntary overworking time) and appropriate action must be taken to ensure a good level of work life balance• employees must be paid wages in line with legal national minimum wage rates• suppliers must, and ensure their supply chain, comply with anti-slavery laws and not engage in any slavery or human trafficking practices• employees should be granted and correctly compensated for any types of paid leave to which they are legally entitled |
| Diversity and Inclusion | <p>At Hammerson, we are strategically focused on building a dynamic and inclusive workplace that mirrors the diverse communities we serve, where everyone has the opportunity to thrive and grow.</p> <p>We believe our Suppliers share this responsibility and should actively promote diversity and inclusion within their own businesses and supply chains.</p> |
| Health and Safety | <p>Hammerson is fully committed to achieving consistently high standards of health, safety and security management and performance. We aim to provide a safe and healthy workplace for the prevention of work-related injury and ill health, to our employees, customers and contractors, and anyone else who may be affected by our actions or activities. We have a strong record in this regard, achieved by our strategic focus on key priorities. Our commitment to health and safety comes from the highest level within the business.</p> <p>As a Supplier to Hammerson, we expect you, as a minimum, to:</p> <ul style="list-style-type: none">• ensure compliance with all relevant legislation and regulations• uphold high standards of health and safety across your operations and, specifically, to ensure that your health and safety management systems comply to ISO45001• conduct suitable and sufficient and site-specific risk assessments of processes• manage hazards and risks to as low as reasonably practicable and in accordance with relevant laws and regulations• provide relevant training to employees to reduce occupational health and safety risk• continually work to improve the management of occupational health and safety |



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| | <ul style="list-style-type: none">• have emergency and contingency plans in place in the case of accidents and incidents <p>Please refer to the Hammerson Health, Safety and Security Policy for further information on how we manage health and safety, which is available upon request.</p> <p>If a Supplier fails to comply with all relevant legislation and regulations required within the Supplier's country of operation, this will be regarded as a serious breach of this Code and may result in the Supplier being in material breach of its contractual obligations towards Hammerson.</p> |
| Sustainable Partnerships, Environmental, Social & Governance | <p>Hammerson is widely recognised for its sustainability performance to ensure it achieves and maintains high levels of performance it participates in global benchmarks including GRESB, ISS ESG and Sustainalytics. We are actively engaged on sustainability issues such as environmental protection, employee welfare, community support and combating corruption.</p> <p>As a Supplier to Hammerson, you play a vital role in supporting this mission. We take a proactive approach to procurement by encouraging our Suppliers to uphold high social, environmental, ethical, and commercial standards. We are committed to working closely with you to achieve these goals. Together, by prioritising sustainability today, we can build strong, lasting partnerships.</p> <p>As a responsible business with a diverse supplier base, Hammerson recognises its duty to trade ethically and sustainably. People, profit, and planet are core priorities for our customers, shareholders, business partners, and employees. Since 2009, our responsible procurement policy has guided our engagement with Suppliers to enhance our shared performance. This Code complements that policy.</p> <p>Our vision is to create flagship destinations that reflect our commitment to improving environmental, social and governance performance and that support delivery of our Net Zero target by 2030. We believe everyone has a responsibility to minimise negative impacts on the environments and communities in which we operate.</p> <p>The development and operation of our assets influence local environmental and social conditions, as well as regional economies. We are dedicated to managing these impacts responsibly, through genuine collaboration with our Suppliers and clients, respect for local communities, and a shared ambition to create sustainable spaces that serve future generations.</p> |



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| | <p>Hammerson's vision is ambitious, and we expect our Suppliers to demonstrate a comparable commitment to managing their environmental, social and governance responsibilities. Where applicable, Suppliers should have an environmental programme and policies in place that, at a minimum, address the following:</p> <ul style="list-style-type: none">• Environmental matters considering product and materials use and logistics• Greenhouse gas emissions and energy consumption• Environmental targets with performance against them reported annually.• Pollution prevention and waste management• Resource efficiency• Biodiversity, no deforestation or land conservation <p>In addition, social aspects should be address and cover the following:</p> <ul style="list-style-type: none">• Responsible procurement• Human rights |
| Data Privacy, Cyber and Information Security | <p>Suppliers must follow all applicable data protection, privacy, cyber and information security laws, including the UK Data Protection Act 2018, the GDPR and equivalent local legislation in the countries in which the Supplier operates. This includes:</p> <ul style="list-style-type: none">• being committed to respecting and protecting, and to not seek personal advantage from all confidential, proprietary commercially sensitive and personal information that comes into your possession, only disclosing to those authorised to receive it commercially confidential as well as the privacy of individuals including, without limitation, a Hammerson customer, employee, or business partner• obtaining the necessary legal consents or be able to demonstrate other lawful grounds for Hammerson to receive and process personal data for due diligence purposes to ensure Suppliers meet our required standards• processing any personal data shared with you by Hammerson lawfully and in accordance with your contractual obligations• only collecting the personal information required to fulfil the service you are providing• take steps to ensure personal information remains accurate and up to date; having a retention schedule to ensure personal information is not retained longer than is necessary• implementing organisational and technical measures to ensure the integrity and confidentiality of personal information• co-operating with and assisting Hammerson with data protection impact assessments or compliance matters which relate to the processing activities being carried out by you on behalf of Hammerson |



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| | <ul style="list-style-type: none">• report as a matter of urgency any unauthorised disclosure of personal data which you are processing on Hammerson’s behalf and to fully co-operate with any remediation efforts and subsequent investigation <p>In compliance with data protection obligations, Hammerson has established an information and cyber security programme aligned to ISO/IEC 27001 international standard for information security. Suppliers processing data for, or on behalf of Hammerson should demonstrate appropriate levels of information security. Hammerson reserves the right to conduct risk-based assessments of supplier’s controls, policies and processes to ensure standards are maintained.</p> <p>Hammerson expects all Suppliers to implement and maintain cyber security safeguards in line with industry standards. This will include appropriate administrative, physical and technical safeguards with a view to protecting the Supplier’s and Hammerson’s data and network and information systems from unauthorised access, acquisition, disclosure, destruction, alteration, accidental loss, misuse, or damage. Among other things, we expect this to include (i) incident monitoring, reporting and response (ii) identity management and authentication tools for relevant systems (iii) appropriate training and awareness for the Supplier’s staff and (iv) ensuring that the Supplier’s own supply chain implements and maintains appropriate cyber security safeguards. Our approach in this area will be supported by periodic audits and/or the completion by Suppliers of cyber security questionnaires and testing.</p> |
| Artificial Intelligence (AI) | <p>We encourage the responsible use of digital tools, including artificial intelligence (AI), to enhance efficiency and innovation. However, we expect Suppliers to exercise caution, ensure ethical and lawful use, and maintain transparency in their deployment and decision-making processes.</p> <p>We require all Suppliers to provide as much advance notice as possible if it proposes to use an AI system to provide goods or services to Hammerson. This applies to the Supplier’s use of AI systems to directly provide goods or services, and not to the use of AI systems as part of the Supplier’s internal management.</p> <p>Where a Supplier discloses that it is using AI in the direct provision of goods or services to Hammerson, we require the Supplier to:</p> <ul style="list-style-type: none">• ensure that any AI systems developed or used by the Supplier are robust, secure, and safe throughout their entire lifecycle;• develop and use AI systems in a way that respects human rights and human-centric values and complies with relevant legal and regulatory requirements, including:<ul style="list-style-type: none">○ fairness, equity, diversity, confidentiality, privacy and data protection; and |



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| | <ul style="list-style-type: none">○ avoiding discrimination and bias;● be transparent about when and how AI is used;● ensure the explainability, auditability and traceability of any AI systems used or developed by the Supplier, including their outputs;● establish and maintain appropriate governance, risk management, policies and procedures that promote the responsible, accountable and ethical use of AI systems; and● where appropriate, ensure that decisions or outcomes from an AI system are contestable. <p>The Supplier must not use or retain Hammerson’s data or confidential information for the purposes of training or inputting into any AI system or model without Hammerson’s prior written approval.</p> <p>If a Supplier is using AI and fails to disclose the use of that system and / or uses or retains Hammerson’s data or confidential information without Hammerson’s consent, this will be regarded as a serious breach of this Code and may result in the Supplier being in material breach of its contractual obligations towards Hammerson. Hammerson also reserves the right to inform the relevant statutory regulators of any disclosure failures.</p> |
| Managing Risk | <p>Hammerson wishes to ensure that risk across the supply chain is handled by the party best able to manage and mitigate it. Risk should not be passed on to sub-contractors or down the supply chain where this risk is best managed by the Supplier or in combination between the Supplier and Hammerson. We expect our Suppliers to work with us to develop mitigation plans and risk monitoring and management plans where deemed critical for Hammerson and our operations. Suppliers will be advised by Hammerson if they are required to prepare such plans which may form part of any contractual arrangement.</p> |
| Continuous Improvement | <p>We encourage and expect our Suppliers (and their supply chain) to have a focus on continuous improvement (in both performance and value) through the application of recognised best practice and other approaches to innovation in their relationships with us. We encourage constructive challenge of the status quo and sharing of new ideas or initiatives to help drive efficiency and ultimately enhance the experience of our tenants and customers.</p> <p>If you wish to utilise elements of this or other Hammerson policies for use with your supply chain, please email info@hammerson.com to obtain licence for use. We can provide blank copies of this and other policies for you to use in the development of your own policies.</p> |



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Raising a concern

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

Concerns can be raised (including on an anonymous basis) by:

Calling: General Counsel and Company Secretary +44 (0)20 7887 1000

Emailing: whistleblowing@hammerson.com

Writing: General Counsel and Company Secretary Hammerson plc, Marble Arch House, 66 Seymour Street, London, W1H 5BX Please mark your envelope "Addressee Only"

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