



HAMMERSON

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Whistleblowing Policy



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Introduction

The Board and Group Executive Committee of Hammerson plc are committed to operating the Group in the best way possible and to do so we need your help. If you have a concern about something happening in relation to Hammerson, its subsidiaries or associates, the Company encourages you to “blow the whistle”: to escalate your concern to someone who can review your concern and solve any problems promptly. This Policy explains how you can do that, and how the Company will engage with and support you in doing so.

You should refer to this Policy if you are concerned about something in relation to, for example, health and safety (e.g. dangerous working conditions or equipment), the environment (e.g. uncontrolled pollution), unethical behaviour (e.g. fraud, bribery, corruption, criminal wrongdoing, modern slavery, financial misstatement), unfair behaviour (e.g. bullying, harassment, discrimination) or anything else that is dangerous, illegal, unethical or gives rise to any concern. However, if you have a general query or want advice on any of these issues, we explain below who you should contact.

In line with our commitment to the highest standards of integrity and workplace safety, and in compliance with the Worker Protection Act 2024, Hammerson plc takes all reasonable steps to prevent harassment, discrimination, and other inappropriate behaviour. This Policy is designed to ensure that employees, contractors, agency workers, directors, and officers can raise concerns about any form of misconduct or unfair behaviour, in a safe and confidential manner. Hammerson and its employees must not allow whistleblowers to be victimised merely because they raise a genuine concern.

Everyone who works at Hammerson can leverage this Whistleblowing Policy, including all employees, contractors, agency workers, directors and officers.

Our Assurances to You

Your safety

Provided you are raising a genuine concern, it does not matter if you are mistaken. Please note we do not extend this assurance to someone who maliciously raises a matter they know is untrue.

. We are committed to fostering a culture where all individuals feel empowered to speak up, knowing they are protected from retaliation and that their concerns will be taken seriously and addressed promptly.

If you raise a genuine concern under this Policy, you will not be at risk of losing your job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of anyone raising a genuine concern and it is a disciplinary matter to victimise anyone who has raised a genuine concern.



Your confidence

With these assurances, we hope you will raise your concern internally in an open manner. However, we recognise that there may be circumstances when you would prefer to speak to someone confidentially (and, if you wish, anonymously) and therefore the Company has in place an external facility to raise a concern, as outlined below.

Whether raising a concern internally or externally, if you so ask, we will not disclose details of your identity during the whistleblowing process without your consent, unless we decide it is necessary to do so to prevent a breach of law or legal obligation. You should understand that there may be times when we are unable to fully resolve a concern without revealing your identity, for example, where your personal evidence is essential. In such cases, we, or if using the external facility, the person handling the concern, will discuss with you whether and how the matter can best proceed.

Please remember that if you do not tell us or the external person handling the concern who you are (and therefore you are raising a concern anonymously) it may be more difficult for us to investigate and resolve the matter.

1. How to Raise a Concern Internally

Please remember that you do not need to have firm evidence of malpractice before raising a concern. However we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

Step One

If you feel comfortable doing so, raise your concern with your line manager. This may be done verbally or in writing.

Step Two

If you do not feel comfortable raising your concern with your line manager, or if you do not think your manager has responded properly, then please contact:

Calling: General Counsel and Company Secretary
Direct dial: +44 (0)20 7887 4650

Emailing: whistleblowing@hammerson.com

Intranet: By going to the Intranet home page, click on the 'Forms' section and search for 'Raise a Concern'.

Writing: General Counsel and Company Secretary
To the Hammerson Plc registered office
Please mark your envelope "Addressee Only"



2. How to Raise a Concern Externally

While we hope this Policy gives you the reassurance that you need to raise your concern internally with us, we recognise that there may be circumstances where you may wish to report a concern externally using an independent and impartial service. Safecall is a leading whistleblowing service provider and has in place a 24/7 hotline and access to a secure web portal. You can choose the level of personal details you wish to disclose or you can remain fully anonymous.

24/7 Hotline: +44(0) 800 915 1571

Secure Web Portal: www.safecall.co.uk/report

How We Will Handle the Matter

If you provide us (or Safecall) with your contact details, we will acknowledge receipt of your contact. We will then, as soon as reasonably practicable, assess your information and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. If you ask, we will write to you summarising your concern and setting out how we propose to handle it.

If you have any personal interest in the matter, we ask that you tell us at the outset. If we think your concern falls more properly within our grievance, bullying and harassment or other relevant procedure, we will let you know.

If it is possible, we will give you feedback on the outcome of any investigation.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using this Policy you will help us to achieve this.

If at any stage you experience reprisal, harassment or victimisation for raising a genuine concern, please contact the Chief People Officer as soon as possible. You are also referred to Hammerson's Anti-Harassment and Bullying Policy available on the intranet.

We will assess all matters raised anonymously (whether via Safecall or other means) and consider what action may be appropriate. As above, this may involve an informal review, an internal inquiry or a more formal investigation.

The Board of Hammerson plc receives formal updates on any whistleblowing activity and the operation of this Policy at least quarterly and the Audit Committee receives an annual summary paper in December. This regular reporting enables the Board to monitor the effectiveness of the Policy, ensure appropriate action is taken, and reinforce a culture of openness and accountability across the Group.



If You Need General Guidance

If you don't have an immediate concern but would like general guidance on a subject, please contact the individuals below. Their contact details can be found using the search function on the Hammerson intranet. If you do wish to notify us of a whistleblowing, you should use one of the methods outlined above rather than contacting the individuals in the table below.

| For general guidance on | Please review | And/or contact |
|--------------------------------------|--|---|
| Whistleblowing, bribery, theft, etc. | fraud, Anti-Bribery Corruption Policy | and General Counsel and Company Secretary |
| Health, safety environment | and Health and Safety Policy Statement of Intent | Health & Safety Manager |
| Harassment discrimination at work | and Harassment and Bullying Policy | Chief People Officer |
| HR/pay issues generally | Employee Handbook | Chief People Officer |

The Board of Hammerson plc is responsible for this Policy which is reviewed annually. The General Counsel and Company Secretary will monitor the operation of the Policy and if you have any comments or questions, please do not hesitate to let them know.

Approved by the Board on 4 December 2025