
EQUAL OPPORTUNITIES POLICY

1. GENERAL

The Company is committed to equal opportunities and diversity in its relations with its employees, clients and others and opposes all forms of unlawful discrimination.

It is Hammerson's policy not to unlawfully discriminate against its workers on the basis of their sex, sexual orientation, marital or civil partnership status, disability, gender reassignment, pregnancy, colour, race, nationality, ethnic or national origin, age, religion, religious belief, part-time or fixed-term status or membership of a trade union (collectively the "unlawful grounds"). Our workers and applicants for employment shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes. The principle of non-discrimination applies equally to the treatment of visitors, clients and customers and suppliers by members of our workforce.

This policy is for guidance only and shall be provided to all workers, but does not form part of your contract of employment.

2. WHAT IS DISCRIMINATION?

Discrimination may be direct or indirect and it may occur intentionally or unintentionally. Direct discrimination occurs when someone is put at a disadvantage because of one of the unlawful grounds. For example, rejecting an applicant of one race because it is considered they would not "fit in" on the grounds of their race could be direct discrimination. Indirect discrimination occurs where everyone is subject to an unjustified provision, criterion or practice but it puts one individual or group at a particular disadvantage because of one of the unlawful grounds. For example, a height requirement would be likely to eliminate proportionately more women than men. If this criteria could not be objectively justified on grounds other than sex, it would be indirectly discriminatory. Discrimination also includes harassment in relation to an unlawful ground and victimisation for raising a complaint or supporting a complaint about discrimination.

3. APPLICABILITY AND RESPONSIBILITY

This policy applies to Hammerson's employees, whether permanent, temporary, casual, part-time or on fixed-term contracts, to job applicants and to individuals such as agency staff and consultants who are not our employees, but who work at Hammerson (collectively "workers").

The overall responsibility for the effective operation of this policy and ensuring its maintenance and review is vested in the Chief Executive Officer.

The Company expects that everyone associated with the Company, whether an employee or not, must behave in accordance with the principles set out in this policy in order to ensure that it is observed and implemented. All workers therefore have a duty to treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, whether junior or senior to them. In addition, all workers have a responsibility to draw to the attention of management any suspected breaches of this policy. Those working at management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that they adhere to this policy and promote its aims and objectives.

4. BREACHES OF THIS POLICY

If you believe that you may have been discriminated against on any of the unlawful grounds in breach of this Policy, you should raise the matter through the Grievance Procedure. If you believe that you may have been harassed on any of the unlawful grounds, you should raise the matter through the Harassment and Bullying Policy. All allegations raised in accordance with the relevant procedure will be dealt with seriously and confidentially. False allegations of a breach of this policy which are found to have been made in bad faith will, however, be dealt with under the Company's Disciplinary Procedure, which may result in disciplinary action being taken, up to and including summary dismissal.

If, after investigation, you are found to have breached this Policy, action will be taken under the Company's Disciplinary Procedure which may result in disciplinary action being taken, up to and including summary dismissal. You should be aware that if you breach this policy, your actions may be breaking criminal as well as civil law and you could be held personally liable.

Workers must not victimise, retaliate against or treat less favourably in any way any person who has made allegations of a breach of this Policy or provided information about such breach. Such behaviour may be treated as gross misconduct in accordance with the Company's Disciplinary Procedure and may result in summary dismissal.

5. DISABILITY DISCRIMINATION

If you are disabled or become disabled during the course of your employment with Hammerson, you are encouraged to tell the Human Resources department or your line manager about your condition. This will enable us to support you as much as possible. You should also notify us of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary, or which would assist you in the performance of your duties. We may wish to consult with you and your medical adviser about possible reasonable adjustments. Careful consideration will be given to such proposals and they will be accommodated where possible and proportionate to the needs of your job.