

## **Hammerson plc**

### **2018 Slavery and Human Trafficking Statement**

*This is our third annual Slavery and Human Trafficking statement and is made pursuant to section 54(1) of the Modern Slavery Act 2015. The statement applies to Hammerson plc ("Hammerson"), its subsidiaries and joint ventures in the United Kingdom where Hammerson acts as asset manager ("the Group") for the financial year ended 31 December 2018 and a listing of these entities is included in Appendix 1. The statement sets out the approach taken by Hammerson to understand the potential modern slavery risks related to its business and explains the actions taken to prevent slavery and human trafficking within the Group's supply chains and own business.*

#### **Our business and supply chains**

At Hammerson, we create vibrant, continually evolving spaces, in and around thriving cities, where people and brands want to be. We seek to deliver value for all our stakeholders and to create a positive and sustainable impact for generations to come. Our portfolio includes investments in flagship destinations in the UK, France and Ireland; convenient retail parks in the UK; and premium outlets across Europe. We are a responsible property owner, manager and developer and have a sustainability vision and strategy, called Positive Places, to create destinations that deliver positive impacts economically, socially and environmentally.

In 2017 we were the first real estate company to commit to become Net Positive for carbon, resource-use, water and socio-economic impacts by 2030. In 2018 we made good progress towards this commitment and more details on our achievements can be found in our [2018 Sustainability Report](#).

#### **Risk management**

Our Group-wide risk management approach is explained in our [2018 Annual Report](#) with more detailed sustainability-related risks being included in our 2018 Sustainability Report. Our risk management policies and procedures provide a robust foundation for identifying risks, assessing mitigation factors and actions and establishing clear management responsibility. Using the Group's risk management framework, which includes both principal and less material operational risks, the Board regularly assesses the Group's residual risks in the context of its risk appetite, which reflects its combined attitude to financial, operational and reputational risks.

From a slavery and human trafficking perspective our key risk areas are within our supply chain and relate to construction activities and low-skilled support services such as cleaning and maintenance.

#### **Our supply chain policies**

We have a [Responsible Procurement Policy](#) which demands that businesses in our supply chain comply with all applicable laws and a [Supplier Code of Conduct](#). 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 would like to work towards with our supply chain between 2015 and 2020. All suppliers must accept this baseline code of conduct to be able to work with us.

Additionally, for contracts over £100,000 we require suppliers to complete our Supplier Survey and formally sign up to our Supplier Code of Conduct. The survey results are published in our [Supplier Report](#). The Supplier Survey is being enhanced in 2019 to incorporate a more robust method to verify and validate supplier responses.

As explained above our key supply chain risks are at an operational level and we have identified a number of key suppliers who provide portfolio-wide services including cleaning, maintenance, project management, telecommunications and IT. These services are often labour intensive and involve low-skilled workers and can also involve the use of subcontractors which acts to reduce the visibility of the supply chain. We continue to work with these suppliers to encourage them to pay their employees wages which are above local market levels, and a number of suppliers implemented above market pay increases in 2018. Contracts with these suppliers include clauses explicitly stating that they will comply with anti-slavery laws and not engage in any slavery or human trafficking practices. We also require suppliers to notify us of any potential breaches of which they become aware and details of how to raise a concern are included in our Supplier Code of Conduct.

We also 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. In 2018 we complied with the new requirements under BEIS's Payment Practices and Performance Reporting.

### Our people

Hammerson is an equal opportunities employer and does not discriminate between local and migrant employees. We directly employ fewer than 550 people across the Group and enjoy high levels of employee retention, engagement and development. 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 and are also able to seek confidential advice from the independent charity, Public Concern at Work.

During 2018, we continued the development and promotion of our Diversity and Inclusion strategy delivering a series of all employee events. These promote greater diversity across business functions and a more inclusive working environment across the Group.

We continue to ensure Modern Slavery awareness is maintained across our operational teams, including how to report any issues. In 2019 we intend on implementing modern slavery and human trafficking training for all Group employees using our recently implemented online training system.

### Effectiveness measured against performance indicators

Our 2018 Annual Report and Sustainability Report both include information on how we have delivered positive economic, social and environmental impacts. 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 and no incidents were raised in these areas during 2018. As explained in our previous statements, we have enhanced a number of our policies and procedures in this area over recent years, and have a number of further improvements planned for 2019.

### Conclusion

We continue to conduct our business affairs to a high standard of integrity, honesty and transparency. As a FTSE4Good and Dow Jones Sustainability Index listed company, we are committed to making a positive impact on the economy, society and environment. This includes working to ensure that slavery and human trafficking do not exist in our supply chains and work places. We review our effectiveness in this area each year and make public our findings through the publication of this annual statement.

This statement is approved by the Hammerson plc Board on 27 June 2019.



David Atkins  
Chief Executive

## Appendix 1

### Entities covered by 2018 Slavery and Human Trafficking Statement

#### Indirect subsidiaries and other wholly-owned entities

280 Bishopsgate Investments Limited	Hammerson (Lichfield) Limited
Abbey Retail Park Limited (Northern Ireland) <sup>1</sup>	Hammerson (Merthyr) Limited
Christchurch UK Limited	Hammerson (Milton Keynes) Limited
Crocusford Limited	Hammerson (Moor House) Properties Limited
Governffect Limited	Hammerson (Newcastle) Limited
Grantchester Developments (Birmingham) Limited	Hammerson (Newtownabbey) Limited
Grantchester Developments (Falkirk) Limited	Hammerson (Oldbury) Limited
Grantchester Group Limited	Hammerson (Paddington) Limited
Grantchester Investments Limited	Hammerson (Parc Tawe I) Limited
Grantchester Limited	Hammerson (Renfrew) Limited
Grantchester Properties (Gloucester) Limited	Hammerson (Rugby) Limited
Grantchester Properties (Luton) Limited	Hammerson (Staines) Limited
Grantchester Properties (Middlesbrough) Limited	Hammerson (Telford) Limited
Grantchester Properties (Nottingham) Limited	Hammerson (Value Retail Investments) Limited
Grantchester Properties (Port Talbot) Limited	Hammerson (Victoria Gate) Limited
Grantchester Properties (Sunderland) Limited	Hammerson (Victoria Investments) Limited
Grantchester Property Management Limited	Hammerson (Victoria Quarter) Limited
Hammerson (60 Threadneedle Street) Limited	Hammerson (Watermark) Limited
Hammerson (9-13 Grosvenor Street) Limited	Hammerson (Whitgift) Limited
Hammerson (Abbey) Limited	Hammerson Birmingham Properties Limited
Hammerson (Bicester No. 2) Limited	Hammerson Bull Ring Limited
Hammerson (Brent Cross) Limited	Hammerson Croydon (GP1) Limited
Hammerson (Brent South) Limited	Hammerson Croydon (GP2) Limited
Hammerson (Bristol Investments) Limited	Hammerson Investments (No. 12) Limited
Hammerson (Bristol) Limited	Hammerson Investments (No. 13) Limited
Hammerson (Cardiff) Limited	Hammerson Investments (No. 16) Limited
Hammerson (Centurion) Limited	Hammerson Investments (No. 23) Limited
Hammerson (Coventry) Limited	Hammerson Investments (No. 26) Limited
Hammerson (Cramlington I) Limited	Hammerson Investments (No. 35) Limited
Hammerson (Cricklewood) Limited	Hammerson Investments (No. 36) Limited
Hammerson (Croydon) Limited	Hammerson Investments (No. 37) Limited
Hammerson (Didcot) Limited	Hammerson Investments Limited
Hammerson (Didcot II) Limited	Hammerson Junction (No 3) Limited
Hammerson (Euston Square) Limited	Hammerson Junction (No 4) Limited
Hammerson (Exeter II) Limited	Hammerson Martineau Galleries Limited
Hammerson (Folkestone) Limited	Hammerson MGLP Limited
Hammerson (Grosvenor Street) Limited	Hammerson MGLP 2 Limited
Hammerson (Kingston) Limited	Hammerson MLP Limited
Hammerson (Leeds Developments) Limited	Hammerson Moor House (LP) Limited
Hammerson (Leeds GP) Limited	Hammerson Operations Limited
Hammerson (Leeds Investments) Limited	Hammerson Oracle Investments Limited
Hammerson (Leeds) Limited	Hammerson Oracle Properties Limited
Hammerson (Leicester GP) Limited	Hammerson Peterborough (GP) Limited

### Indirect subsidiaries and other wholly-owned entities (continued)

Hammerson Peterborough (No 1) Limited	New Southgate Limited
Hammerson Peterborough (No 2) Limited	Precis (1474) Limited
Hammerson Project Management Limited	RT Group Developments Limited
Hammerson Ravenhead Limited	RT Group Property Investments Limited
Hammerson Retail Parks Holdings Limited	SEVCO 5025 Limited
Hammerson Sheffield (NRQ) Limited	Spitalfields Developments Limited
Hammerson Shelf Co 7 Limited	Spitalfields Holdings Limited
Hammerson Shelf Co 9 Limited	The Junction (General Partner) Limited
Hammerson Shelf Co 10 Limited	The Junction (Thurrock Shareholder GP) Limited
Hammerson UK Properties plc	The Junction Limited Partnership <sup>6</sup>
Hammerson Wrekin LLP	The Junction Thurrock (General Partner) Limited
Junction Nominee 1 Limited	The Junction Thurrock Limited Partnership
Junction Nominee 2 Limited	The Martineau Galleries Limited Partnership
Leeds (GP1) Limited	Thurrock Shares 1 Limited
Leeds (GP2) Limited	Thurrock Shares 2 Limited
London & Metropolitan Northern LWP Limited Partnership	Union Square Developments Limited
Martineau Galleries (GP) Limited	West Quay (No.1) Limited
Martineau Galleries No. 1 Limited	West Quay (No.2) Limited
Martineau Galleries No. 2 Limited	West Quay Shopping Centre Limited
Mentboost Limited	Westchester Holdings Limited
Monesan Limited	Westchester Property Holdings Limited

### Indirectly held joint venture entities

Bishopsgate Goodsyard Regeneration Limited (50%)	Hammerson (Leicester) Limited (50%)
Brent Cross Partnership (41%)	Highcross (GP) Limited (50%)
Bristol Alliance (GP) Limited (50%)	Highcross Leicester (GP) Limited (50%)
Bristol Alliance Limited Partnership (50%)	Highcross Leicester Limited Partnership (50%)
Bristol Alliance Nominee No. 1 Limited (50%)	Highcross Residential (Nominees 1) Limited (50%)
Bristol Alliance Nominee No. 2 Limited (50%)	Highcross Residential (Nominees 2) Limited (50%)
BRLP Rotunda Limited (50%)	Highcross Residential Properties Limited (50%)
Bull Ring (GP) Limited (50%)	Highcross Shopping Centre Limited (50%)
Bull Ring (GP2) Limited (50%)	Moor House General Partner Limited (67%)
Bull Ring No. 1 Limited (50%)	Oracle Nominees (No. 1) Limited (50%)
Bull Ring No. 2 Limited (50%)	Oracle Nominees (No. 2) Limited (50%)
Croydon (GP1) Limited (50%)	Oracle Nominees Limited (50%)
Croydon (GP2) Limited (50%)	Oracle Shopping Centre Limited (50%)
Croydon Car Park Limited (50%)	Reading Residential Properties Limited (50%)
Croydon Limited Partnership (50%)	Silverburn Investment Advisor Limited (50%)
Croydon Management Services Limited (50%)	The Bull Ring Limited Partnership (50%)
Croydon Property Investments Limited (50%)	The Highcross Limited Partnership (50%)
Grand Central (GP) Limited (50%)	The Moor House Limited Partnership (67%)
Grand Central Limited Partnership (50%)	The Oracle Limited Partnership (50%)
Grand Central No 1 Limited (50%)	The West Quay Limited Partnership (50%)
Grand Central No 2 Limited (50%)	Whitgift Limited Partnership (50%)