

# GRI COMPLIANCE

We have benchmarked our reporting against the updated Global Reporting Initiative sustainability reporting guidelines GRI: G3. We assess our application of the GRI reporting framework to be at level B. The process employed to apply these principles is summarised in the tables below.

## Application of the GRI Guidance on defining report content and the associated principles

GRI PRINCIPLES	COMMENTARY
<b>Materiality</b>	<p>During autumn 2007, Hammerson undertook a thorough materiality review of its sustainability impacts, including four of the five materiality tests put forward by AccountAbility. Our study encompassed: a review of peer best practice; analysis of regulatory and societal norms; interviews with over 20 internal and external stakeholders, including CR group members; and analysis of those issues with a direct link to our financial performance. As a result of this we carried out two key activities. Firstly, we prioritised the five key issues (climate change and energy, resource use, community regeneration, supply chain, customers) upon which our sustainability strategy is now focussed and around which this report is structured. Secondly, we reorganised our internal management structure to three core working groups as laid out on page 7 in order to take advantage of institutional sustainability capacity in these three key business operations.</p> <p>Through our involvement in industry forums, our engagement with stakeholders and our tracking of legislation we are continuously reviewing our approach to sustainability and the materiality of the issues that we address. Nevertheless our intention will be to undertake another formal review of our materiality approach in 2010.</p>
<b>Stakeholder inclusiveness</b>	<p>The stakeholders to whom we consider ourselves accountable are mentioned throughout the report and on pages 6, 42 and 43. Our focus during 2008 in both France and the UK has been on engaging in particular with office occupiers, visitors, SRI and mainstream investors, staff, retailers, industry bodies and community organisations.</p> <ul style="list-style-type: none"> <li>– Engagements with investors and industry bodies during 2009 have specifically led to the expansion of our key performance indicators, as well as the decision to utilise the Accounting for Sustainability and Global Reporting Initiatives in the CR Report 2008.</li> <li>– Engagements with staff and government have led to the decision to undertake a shadow assurance process with Bureau Veritas this year.</li> <li>– Engagement with staff, retailers and office occupiers has led us to focus on improving the communication style and content of our summary report in comparison to 2007.</li> </ul>
<b>Sustainability context</b>	<p>Our report aims to describe the context for addressing sustainability and our key impacts throughout, as well as reflecting on what we perceive to be the most significant challenges during the current economic conditions and in the future climate scenarios. We have also included a summary of what we perceive to be the most important sustainability legislation in the UK, France and at an EU level on pages 44-48.</p> <ul style="list-style-type: none"> <li>– For our specific material impacts, we have provided industry benchmarks where these are available in the Connected Reporting Framework pages.</li> <li>– For our managed assets, we have submitted our assets to the Upstream Benchmarking for Retail Properties for eight years and for Office Properties for two years.</li> <li>– For our development assets, we utilise the BREEAM and HQE frameworks to enable comparison across projects.</li> <li>– In terms of broader peer comparison, our inclusion in the FTSE4Good, DJSI and our leadership position in the Carbon Disclosure Project has enabled us to understand our own position across a broad number of sustainability criteria.</li> </ul>

**GRI PRINCIPLES**

**COMMENTARY**

**Completeness**

The report was developed taking in to account Hammerson's impacts throughout its supply chain and across all of its corporate, asset management and development activities in the UK and France. Where performance data does not cover all operations or assets, this is noted in the data qualifying notes. All data refers to the calendar year until December 2008 unless otherwise indicated.

In 2008 we have extended our reporting and performance data to cover all assets under management for a full calendar year where we own more than 25% of an asset, and have also covered St Quentin carpark, where our ownership is 19% on the basis of the fact that we would be reporting on St Quentin shopping centre energy consumption, and it seemed sensible to aggregate these together. We report complete utility consumption and waste production for a given asset, rather than adjusting for equity share of each asset.

Please note that we do not report on the operational environmental or social performance of:

- any of our assets with Fully Repairing and Insuring leases, such as Bishops Quarter in London, where we have no management control and therefore no ability to influence sustainability performance except at the leasing stage
- the operational environmental performance of assets in the development portfolio which we intend to redevelop
- any assets which have opened during the calendar year, such as Bristol Cabot Circus or Highcross, Leicester, which will be included in 2009 reporting
- our minor ownership of Forum Steglitz in Germany, which represents less 1% of our total asset ownership, as this is a negligible percentage

We believe that this approach represents the fullest level of reporting that we believe to be applicable for a property company of our size and business structure.

This report provides information on our performance against our most material environmental, social and economic aspects. Additional information on our business and financial performance, corporate governance and Directors' remunerations is provided in our Annual Report and Accounts. The most significant change in this year's report has been our attempt at the full integration of the UK retail parks, the French corporate operations and the French retail and office assets in comparison with the 2007 CR Report.

With regards to data quality and reliability, actual measurements are used wherever possible, and where estimation is used this has been indicated. In a number of cases data collection parameters have changed, and where this is the case this is indicated in the data qualification notes.

CONTENTS CHECKLIST		DESCRIPTION
<b>1 Strategy and analysis</b>		
1.1	Statement from the most senior decision-maker of the organisation about the relevance of sustainability to the organisation and its strategy.	Chairman quote page 1. Chief Executive's statement – page 3. Value – pages 6-7.
1.2	Description of key impacts, risks and opportunities.	Chief Executive's statement page 3. Head of Sustainability statement page 4. Value pages 8-10.
<b>2 Organisational profile</b>		
2.1	Name of the organisation.	Front cover.
2.2	Primary brands, products, and/or services.	Who we are statement – inside cover; Annual Report – page 1.
2.3	Operational structure of the organisation, including main divisions, operating countries, subsidiaries and joint ventures.	Who we are statement – inside cover; Annual Report – page 2.
2.4	Location of organisation's headquarters.	Back cover (CR and Annual Report).
2.5	Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Who we are statement – inside cover; Annual Report – page 1.
2.6	Nature of ownership and legal form.	Annual Report – pages 1, 93.
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	Performance Indicators – page 64. Annual Report page 2.
2.8	Scale of the reporting organisation, including – Number of employees; – Net sales (for private sector organisations) or net revenues (for public sector); – Total capitalisation broken down in terms of debt and equity; – Quantity of products or services provided.	Performance Indicators – page 64. Annual Report pages 25, 27, 55.
2.9	Significant changes during the reporting period regarding size, structure, or ownership including: – The location of, or changes in operations, including facility openings, closings, and expansions; and – Changes in the share capital structure and other capital formation, maintenance and alteration operations.	Annual Report pages 4-5, 26.
2.10	Awards received in the reporting period.	Annual Report – pages 18-19, 25-26; About Us section of corporate website.
<b>3 Report parameters</b>		
3.1	Reporting period for information provided.	The report covers the calendar year ending 31 December 2008.
3.2	Date of most recent previous report.	The previous report was published in March 2008, covering the calendar year ending 31 December 2007.
3.3	Reporting cycle.	Annually in line with Annual Report and Accounts.
3.4	Contact point for questions regarding the report or its contents.	Back cover, page 5.
3.5	Process for defining report content, including: – Determining materiality; – Prioritising topics within the report, and – Identifying stakeholders the organisation expects to use the report.	Our five material issues and stakeholders – page 17. Compliance with GRI guidelines – page 72.

CONTENTS CHECKLIST		DESCRIPTION
<b>3 Report parameters continued</b>		
3.6	Boundary of the report (e.g. countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers).	Data qualifying notes – page 50. Compliance with GRI guidelines – pages 72-73.
3.7	State any specific limitations on the scope or boundary of the report.	Data qualifying notes – page 50. Compliance with GRI guidelines – pages 72-73.
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organisations.	Data qualifying notes – page 50. Compliance with GRI guidelines – pages 72-73.
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report.	Data qualifying notes and Performance Indicators – pages 50-64.
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement.	Data qualifying notes and Performance Indicators – pages 50-64. CRF – page 14.
3.11	Significant changes from previous reporting periods in the scope, boundary or measurement methods applied in the report.	One Hammerson – pages 11-12. Compliance with GRI guidelines – page 73. Data qualifying notes and Performance Indicators – pages 50-64.
3.12	Table identifying the location of the Standard Disclosures in the report.	Compliance with GRI guidelines – pages 74-76.
3.13	Policy and current practice with regard to seeking external assurance for the report.	Advisor's statement – page 81. Head of sustainability statement – page 5.
<b>4 Governance, commitments and engagement</b>		
4.1	Governance structure of the organisation, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organisational oversight.	Annual Report – pages 36-39.
4.2	Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organisation's management and the reasons for this arrangement).	Annual Report – pages 36-39.
4.3	For organisations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	Annual Report – page 36.
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Knowledge and Reporting – page 40. Annual Report – page 37.
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance).	Annual Report – pages 44-51.
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Annual Report – pages 36-39.
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics.	Annual Report – pages 36-39.

CONTENTS CHECKLIST	DESCRIPTION
<b>4 Governance, commitments and engagement</b> continued	
<p>4.8 Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental and social performance and the status of their implementation.</p>	<p><b>Publicly available on our website</b></p> <ul style="list-style-type: none"> <li>– an Environmental Policy – in full implementation;</li> <li>– a Responsible Procurement Policy – in the process of being implemented;</li> <li>– an Equal Opportunities Policy – in full implementation.</li> </ul> <p><b>Intenally</b></p> <ul style="list-style-type: none"> <li>– Corporate Control Manual – in full implementation;</li> <li>– Code of Conduct – in full implementation;</li> <li>– Whistleblowing procedures – in full implementation;</li> <li>– Staff Handbook – in full implementation, Annual Report – pages 22, 39.</li> </ul>
<p>4.9 Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, code of conduct and principles.</p>	<p>Annual Report – pages 36-39.</p>
<p>4.10 Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance.</p>	<p>Annual Report – page 36.</p>
<p>4.11 Explanation of whether and how the precautionary approach or principles is addressed by the organisation.</p>	<p>The precautionary approach is addressed by the organisation through the use of Sustainability Implementation Plans for developments, Environmental Management Systems for our managed assets (some of which are certified to ISO 14001) and the climate change mitigation and adaptation that we are carrying out at the moment.</p>
<p>4.12 Externally developed economic, environmental, and social charters, principles or other initiatives to which the organisation subscribes or endorses.</p>	<p>Community regeneration – page 30. Membership organisations – page [●]. Annual Report – page 16-17.</p>
<p>4.13 Membership in associations (such as industry associations) and/or national/international advocacy organisations in which the organisation:</p> <ul style="list-style-type: none"> <li>– has positions in governance bodies;</li> <li>– participates in projects or committees;</li> <li>– provides substantive funding beyond routine membership dues; or</li> <li>– Views membership as strategic.</li> </ul>	<p>Community regeneration – page 30. Membership organisations – page [●] Annual Report – pages 16-17.</p>
<p>4.14 List of stakeholder groups engaged by the organisation.</p>	<p>Material issues and stakeholders – page 6.</p>
<p>4.15 Basis for identification and selection of stakeholders with whom to engage.</p>	<p>Material issues and stakeholders – page 6.</p>
<p>4.16 Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.</p>	<p>Knowledge and Reporting – page 40.</p>
<p>4.17 Key topics and concerns that have been raised through stakeholder engagement, and how the organisation has responded to those key topics and concerns, including through its reporting.</p>	<p>Knowledge and Reporting – page 40.</p>

In order to achieve Level B certification, GRI specifies that an organisation should fully report against 20 indicators, including at least one indicator under each of the six categories. In compiling this report, we have carried out a full evaluation of all GRI indicators and found that some are not relevant to our reporting. We have also identified indicators where we do not have sufficient data to report against them, which we have listed as partially fulfilled. We will be reviewing those indicators where we do not have sufficient data in time for the 2009 report. With regards to a number of environmental indicators in particular, we look forward to more appropriate specification of indicators for the sector in the GRI Construction and Real Estate sector supplement.

As can be seen in the table below, upon the advice of our strategic sustainability advisors Upstream Sustainability Services, we have assessed ourselves as having fully completed 22 indicators.

Management approach and Performance Indicators	Core or additional indicator	Location or description	Full or partial	
<b>EC Economic indicators</b>				
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings and payments to capital providers and to governments.	Core	Performance Indicators – page 64.	Full
EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change.	Core	Chief Executive's statement – page 3. Head of Sustainability statement – page 4. Value – page 10; Legislation – pages 44, 46. CRF Tables pages – 13-14. Carbon Disclosure Project submission on the CDP website.	Full
EC4	Significant financial assistance received from government.	Core	Performance Indicators – page 63. The government is not present in the shareholding structure. Our status as a Real Estate Investment Trust is material to this indicator.	Full
<b>EN Environmental indicators</b>				
EN2	Percentage of materials used that are recycled input materials.	Core	Performance Indicators – page 56. (Scope is limited to UK shopping centre developments during 2008 and calculated based on a specific Waste Resources Action Programme project).	Partial
EN3	Direct energy consumption by primary energy source.	Core	Performance Indicators – page 52.	Partial
EN4	Indirect energy consumption broken down by primary source.	Core	Performance Indicators – page 53.	Full
EN5	Energy saved due to conservation and efficiency improvements.	Additional	Performance Indicators – page 53.	Full
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	Additional	Hammerson's core product is the buildings which are occupied by our tenants – initiatives to provide a more energy efficient product are given in the case studies and target review in Climate Change and Energy – pages 23-26 and Resource Use – pages 27-29. Hammerson's core service is the leasing of space to our tenants – initiatives to provide a more energy efficient service are given in the case studies and target review in Customers – pages 37-39. Quantified reductions are reported in the Performance Indicators – page 51.	Full

Management approach and Performance Indicators	Core or additional indicator	Location or description	Full or partial
<b>EN Environmental indicators</b> continued			
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	Additional There is indirect energy use associated with our products and services with regards to: a) the energy intensity of the materials used to construct our buildings b) energy used during the construction phase of our developments c) business-related travel d) employee commuting. Initiatives to reduce indirect energy in these areas are presented in Supply Chain – pages 34-36; Climate Change and Energy – pages 23-26; and Resource Use – pages 27-29. Quantification for c is included in Performance Indicators – page 52, but we do not as yet actively measure the embodied energy use in our materials nor fully disclose b and d.	Partial
EN8	Total water withdrawal by source.	Core Performance Indicators – page 54.	Full
EN10	Percentage and total volume of water recycled and reused.	Additional Performance Indicators – page 54.	Full
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	Additional No water reuse or recycling in our assets is recorded at present. However, new extensions and developments include rainwater harvesting, meaning our performance will improve in 2009.  Hammerson has integrated biodiversity considerations into its own Sustainability Implementation Plans for developments, as well as addressing biodiversity through the Ecology credits in the BREEAM system for the UK and the HQE standard for France. The BREEAM and HQE systems include consideration of green roofs, appropriate brown roofs on the habitat of black Redstarts, bat boxes and increased species of flora and fauna, and development specific targets have been set. However, we do not currently have in place a methodology for establishing risk exposure to biodiversity in our development or investment portfolio, nor consistent monitoring processes. However, we have set a target to develop a biodiversity programme for 2009 and aim to address the requirements of this indicator in that programme.	Full
EN16	Total direct and indirect greenhouse gas emissions by weight.	Core Performance Indicators – page 53.	Full
EN17	Other relevant indirect greenhouse gas emissions by weight.	Core Performance Indicators – page 53.	Full
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Additional Climate Change and Energy – pages 23-26. Resource Use – pages 27-29. CRF – pages 13-14.	Partial
EN19	Emissions of ozone-depleting substances by weight.	Core Performance Indicators – page 52.	Full
EN22	Waste by type and disposal method.	Core Performance Indicators – page 55.	Full
EN23	Total number and volume of significant spills.	Core Performance Indicators – page 56.	Full
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	Core Climate Change and Energy – pages 23-26. Resource Use – pages 27-29. Supply Chain – pages 34-36.	Partial
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Core Performance Indicators – page 56.	Full

	Management approach and Performance Indicators	Core or additional indicator	Location or description	Full or partial
<b>LA</b>	<b>Labour practices and decent work Performance Indicators</b>			
LA1	Total workforce by employment type, employment contract and region.	Core	Performance Indicators – page 61.	Full
LA2	Total number and rate of employee turnover by age group, gender and region.	Core	Performance Indicators – page 61.	Partial
LA10	Average hours of training per year per employee by employee category.	Core	Performance Indicators – page 62.	Partial
LA12	Percentage of employees receiving regular performance and career development reviews.	Additional	Performance Indicators – page 62.	Full
LA7	Rates of injury, occupational diseases, lost days and absenteeism and number of work-related fatalities by region.	Core	Performance Indicators – page 63.	Partial
<b>PR</b>	<b>Product responsibility Performance Indicators</b>			
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services, by type of outcomes.	Additional	Performance Indicators – page 60.	Full
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	Additional	<p><b>France shopping centres</b> Satisfaction surveys are conducted at shopping centres every two years with the last survey in 2007. The sample size is 1,200 for a questionnaire in each shopping centre. The survey examines why customers enjoy visiting the centres or not. Customers are asked to rank their experience in terms of comfort, cleanness of the site, air conditioning, merchandising, services provided, car park, security, equipment available. Headline findings given in the Performance Indicators. Other mechanisms for customer feedback include the surveys on comfort and services by an organisation called Market Audit, which takes a smaller sample of customers.</p> <p><b>UK shopping centres</b> Customer surveys completed once a year. At Bullring and Brent Cross, the sample size is 2,000; at the other shopping centres, the sample size is 1,250. The methodology is exit interviews, quota'd by day, time and exit point. Headline findings given in the Performance Indicators. There are also additional customer comment leaflets at the customer service desks.</p>	Full

	Management approach and Performance Indicators	Core or additional indicator	Location or description	Full or partial
<b>SO Society Performance Indicators</b>				
S01	Nature, scope, and effectiveness of any programmes and practices that assess and manage the impacts of operations on communities, including entering, operating and exiting.	Core	<p>At the moment, there are ad-hoc programmes in place for assessing the impacts of operations on local communities but they are not yet consistently applied. For example, when entering the community in France, depending on the size of the project (above 10,000 m<sup>2</sup>) surveys are carried out prior to filing for the planning permission looking at and evaluating the following topics are evaluated and assessed:</p> <ul style="list-style-type: none"> <li>• Topographic situation</li> <li>• Public transport and bike spaces created</li> <li>• Expansion of the planted and green areas</li> <li>• Specific programme favouring employment for people living in the district</li> <li>• Car park and signage</li> <li>• Visitors' Health and Safety.</li> </ul> <p>Our intention is to integrate the GRI criteria into the community regeneration framework in 2009 in order to enable us to report fully against this indicator in successive years.</p>	Partial
S06	Total value of financial and in-kind contributions to political parties, politicians and related institutions by country.	Additional	Performance Indicators – page 63.	Full
S08	Monetary value of significant fines and total number or non-monetary sanctions for non-compliance with laws and regulations.	Core	Performance Indicators – page 63.	Full
<b>HR Human rights Performance Indicators</b>				
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	Core	<p>Hammerson had 1,700 suppliers in the UK and 820 in France in 2008. As mentioned in the CRF tables, we have undertaken sustainability engagement with a number of our suppliers but have not undertaken any kind of human rights screening to date. This may be an area that we would wish to consider for our supply chain in future.</p>	Full

## Management Disclosures

### Economic Management Disclosures

**Economic performance** – Our management approach and monitoring is explained in our Annual Report – see the Financial Highlights on page 3, Chairman's Statement on page 4, and the Risk Management section on page 14.

**Market Presence** – Our management approach is explained in our Annual Report – see the Property Portfolio section on page 23.

**Indirect Economic Impacts** – Hammerson is concerned with the economic impact the Company has in the communities where it operates and considers this aspect to be material to its sustainability strategy. Therefore information can be found in the Community Regeneration and Supply Chain sections of the CR Report 2008 on pages 30-36, as well as in the Performance Indicators section on pages 50-64.

### Environmental Management Disclosures

Our management approach and additional contextual information for our material environmental aspects is explained thoroughly in the Climate Change and Energy and Resource Use (pages 23-29) and in the CRF pages 13-20. We also have an Environmental Policy available on the website and summarised in the Annual Report (page 22). Hammerson has implemented an online Environmental management system called E Risk across our portfolio. Additionally Hammerson have delivered ISO 14001 at 99 Bishopsgate and BREEAM Operation and management at 10 Grosvenor Street and Harbour Exchange. Workman manages our Retail Park portfolio in accordance with ISO 14001 and we have commenced roll out of ISO 14001 in our shopping centre portfolio starting at WestQuay. Our monitoring of our environmental performance can be seen in the target review (page 24) and the performance indicators (page 50). A gap analysis of staff sustainability training was undertaken in 2008 and recommendations from this gap analysis will be rolled out in 2009.

### Labour Practice Management Disclosures

#### **Employment, Labour and Management Relations, Occupational Health and Safety, Training and Education, Diversity and Equality –**

We recognise that a happy, healthy workforce is pre-eminent to our success as a business, and poor management of labour practice is identified as a key business risk in the Risk Management Section of our Annual Report (page 14). Primary organisational responsibility for Labour Practice sits with our Director of HR, Sally Learoyd, and the Senior Management team – information on these individuals can be found on our website or in the Annual Report (pages 8-11). In terms of specific policies, we have a publically available Equal Opportunities policy on our website and further information in our internal Staff Handbook. Our Performance Indicators demonstrate our monitoring with regards to employee equality and diversity, employee satisfaction and career development, and occupational health and safety on pages 61-63. We have also submitted a response to the Times Best Companies to Work For award in 2008 and will aim to improve our disclosures in this area in 2009.

### Society Management Disclosures

**Community** – This is one of our material impact areas and there is substantial information related to our goals, policy, monitoring and key contextual information included in the Community Regeneration section (pages 30-33), the CRF (page 18) and Performance Indicators (page 57). Organisational responsibility lies with the Community Manager, Michelle Dawson, and the Corporate Working Groups in both the UK and France.

**Corruption, Public Policy, Anti-Competitive Behaviour and Compliance** – The Board has ultimate responsibility for the Group's system of internal control, which is managed by the Group Financial Controller, Warren Austin, and is discussed in the Annual Report. Internally, we have a Corporate Control Manual, a Code of Conduct, Whistleblowing procedures and a Staff Handbook all in Full implementation (see Annual Report – pages 22, 39). Monitoring against some elements of these indicators are disclosed on page 63.

### Product Responsibility Disclosures

Our product is the buildings we develop and manage. We have included a dedicated section on customers (pages 37 - 39), which covers the occupiers and their customers who use our buildings.

**Customer Health and Safety** – ensuring that our tenants and visitors are safe and healthy is a key goal for our asset management activities and we record performance indicators on this topic (page 60).

**Product Service Labelling and Compliance** – BREEAM and HQE are the green rating tools or "labels" that are used to rate our new developments, and through law we are required to produce EPCs in the UK and DPEs in France for our managed assets. Our performance with regards to this labelling is discussed in the Value section on page 9.

**Marketing Communications and Customer Privacy** are not considered to be material to the product of a building.

### Human Rights Management Disclosures

Human Rights issues are not material due to the nature and location of Hammerson's operations in the UK and France. However, we do recognise that there may be human rights issues associated with materials production in our supply chain and will aim to integrate some consideration of human rights in to our review and implementation of supply chain procedures in 2009.