



UNIBAIL-RODAMCO-WESTFIELD

19 March 2024

URW Integrity line and Whistleblowing Statement

URW employees and third parties have the possibility to report to URW any alleged violation or suspected wrongdoing of URW Code of Ethics, URW policies, local laws, and regulations. Concerns can be raised using the URW Integrity Line by clicking on the link <https://urw.integrityline.org/>.

Raising a concern in good faith will not expose the person to retaliation even if the concern is unsubstantiated and/or inaccurate.

Any concern raised will be handled in full confidentiality to the extent permissible and possible while addressing the report. Whistleblowers may decide to remain anonymous which is possible using the URW Integrity Line, but it is important in such a case to provide as much as possible details.

How to raise a concern?

- URW Integrity Line can be accessed by clicking on <https://urw.integrityline.org/>
- Select your respective country – we invite you to read URW local policy and procedure applicable regarding Whistleblower alerts, protection, and data privacy.
- Communicate and exchange any necessary document you may think can substantiate the report. Mention a clear description of the alleged violation or suspected wrongdoing with clear and simple terms.

The above conditions are applicable across the Group but may be adapted to comply with local laws and regulations. If you are in doubt, please feel free to reach out to the Group Compliance Officer to know more.

What happens when a concern is reported in the URW Integrity Line?

Upon the receipt of the concern the Group Compliance Officer will confidentially review in the strictest of confidence your concern and will send the whistleblower a receipt confirmation within the local applicable periodic norms.

The Group Compliance Officer will as well:

- Confirm to the whistleblower if the reported incident falls under the scope of the whistleblower type of alerts.
- Provide an estimation of the timing and next steps when possible.
- Request any additional information if needed and request approval from the whistleblower if someone else should be added to the loop of the discussion.
- Launch the investigation and once finalized, inform the Whistleblower about the result of the investigation.

What is the purpose of the investigation?

Once the Group Compliance Officer is informed about the alert, it might be necessary in some cases to stop the possible wrongdoing reported from keep happening and therefore, some actions may be taken before the conclusion of the investigation.

The purpose of the investigation is to address concerns confidentially and with neutrality to benefit all stakeholders including employees of URW and the Group.

While the investigation is ongoing, the whistleblower will be protected from the moment of the report until the case is closed and even afterwards from any retaliatory action against them in relation to the reported concern made in good faith by the whistleblower.

Appropriate records of the investigation will be kept in confidence and if local laws allow it. It is as important for URW to protect the data of individuals involved and therefore, the investigation will adhere to the strict rules and regulation of data privacy as applicable in the respective countries. For more information on the Data Privacy regulations, please visit <https://urw.integrityline.org/> and select your respective country and the Data Privacy annex relevant to you.

What happens at the end of an investigation?

Once an investigation is concluded and while respecting the deadlines permissible under local applicable laws, the Group Compliance Officer will share with the Whistleblower the result and findings as legally possible of the investigation. Mitigating and disciplinary measures may be taken following the investigation, those measures will be proportional and in line with the local applicable laws and regulations in the respective countries.



Raise a Concern