

METRO Code of Conduct for business partners

Generating added value for our customers is at the heart of METRO's strategy. We act today for tomorrow responsibly and meticulously, to enhance our business impact and to the benefit of our customers, society and the environment. We expect any private entity or individual person offering goods or services to METRO (hereafter "business partners") to share our [commitments](#) and adhere to our principles.

This Code of Conduct sets forth the fundamental key principles we expect from our business partners and their subcontracted companies.

Human rights

Principle 1: No human rights abuses

We expect our business partners to respect internationally proclaimed human rights, as defined by the [International Labour Organisation](#) (ILO) and ensure no involvement in human rights abuses.

Labour

Principle 2: No forced or child labour

Our business partners commit to not being engaged in any form of forced, compulsory or prison labour, any other form of involuntary labour or any other form of abuse coercion or harassment as defined by the ILO. Moreover, we do not tolerate child labour or any form of exploitation of young employees. Business partners shall only employ workers who are legally authorised to work in their facilities, but not below age of 15. Business partners are also responsible for validating employees' eligibility to work through appropriate documentation and establishing employment relationships in compliance with national legislation.

Principle 3: No discrimination

We require our business partners to treat every employee equally and according to their abilities and performance. The same opportunities shall be granted regardless of race, ethnic origin, religion and belief, political opinion, nationality, disability, age, sexual orientation or gender.

Principle 4: Freedom of association

We expect our business partners to respect the rights of employees to collective bargaining and freedom of association. Employees shall be free to join unions without reprisal, discrimination or obstruction.

Principle 5: Fair wages & working hours

We require our business partners to ensure that wages for regular working and overtime hours are paid regularly to employees and shall meet or exceed legal minimums and/or applicable industry standards, whichever is higher. The use of overtime is voluntary and compensated at premium rate. Working hours and public holidays shall comply with applicable national law. Our business partners shall not require a working week, including overtime, of over 60 hours on a regular basis. Employees shall be allowed at least one day off after six consecutive

days of work. Deductions will be permitted only under the conditions and to the extent prescribed by law or fixed by collective bargaining agreement.

Principle 6: Workplace health & safety

Our business partners commit to providing a safe and healthy working environment and adhere to all applicable laws on occupational health and safety. Furthermore they shall adopt measures to prevent and minimise potential accidents and health hazards by providing personal protective equipment and training updates on applicable health and safety regulations, implementing systems capable of detecting, avoiding and responding to potential health and safety hazards.

Environment

Principle 7: Safe and high quality products and services

We require our business partners to ensure that they operate and maintain an effective quality management system eliminating the risk of fraud and ensuring production in accordance with the agreed quality and safety standards. We expect responsible and efficient use of natural resources (e.g. emissions, soil, air, water and oceans) in production and throughout the entire value chain.

Principle 8: Protection of environment and reducing environmental footprint

To protect the environment and the climate we expect our business partners to responsibly use resources and to comply with or exceed all applicable local environmental legislation. Our business partners undertake continuous efforts to optimize their business and production processes in accordance with circular economy principles of thinking in cycles and considering life cycle costs, and to foster this development by introducing environmentally friendly technologies, increasing efficiency and reducing their environmental footprint.

Business ethics

Principle 9: Fair business practice & ethics

We expect our business partners to uphold the highest standards of business ethics and adhere to all applicable laws and regulations including preventing money-laundering and the financing of terrorism. Our business partners are expected to deal with contracting partners in a responsible, professional and diligent way and to support a fair and open competitive business

environment. Our business partners ensure that they uphold all principles of this Code of Conduct, and the business ethics in particular, by providing suitable guidelines and training programmes to its employees to ensure that all staff members adhere to these principles.

Principle 10: Anti-corruption & bribery

We require our business partners to strictly abstain from any corruption and/or bribery practices. Moreover, they must not allow any conflicts of interest that can harm METRO's business.

Principle 11: Antitrust & competition

Our business partners commit to doing business strictly in line with applicable antitrust and competition laws. This includes the requirement that goods and services offered to us must be free from anti-competitive practices such as price-fixing with competitors.

Principle 12: Data protection

We require our business partners to ensure the sufficient protection of rights to personal privacy of its employees and their personal data, as well as compliance with statutory provisions on data protection.

Monitoring the Code of Conduct for business partners

These principles are regarded as minimum requirements which we strive to exceed wherever possible. Moreover, we expect our business partners to introduce a management system which must include clear responsibilities and processes as well as adequate documentation.

Acknowledgement

In order to ensure compliance with these principles, we expect our business partners to inform all of their employees/subcontractors of the content of the METRO Code of Conduct for business partners and ensure that they also comply with the provisions incorporated therein.

Reporting violations

Business partners shall report any suspected violations of regulations, laws and the Code. Violations should be reported to the METRO contact person, or can be reported confidentially using the METRO Compliance Reporting System:

<https://www.bkms-system.net/metrogroup/speakup>