

Business Principles for employees of METRO

1. We make a strict distinction between personal interests and the interests of the company.

When dealing with business partners, we are representing the METRO and its interests. On no account do we try to turn these situations to our personal advantage – otherwise we would be placing our own interests and objectives above those of the company. Then we would be harming not only ourselves but the reputation of the METRO: in some cases even a hint of wrongdoing can be damaging. Therefore, we need to avoid any appearance of seeking personal gain against company interests. And if there is something we are not sure about, we consult our line manager or our Compliance Officer.

2. We don't offer anyone an advantage that cannot be justified.

Whether we are dealing with a public authority, a company or some other third party, we do not offer anyone an advantage which cannot be justified – nor, if possible, do we allow this to happen. This also applies in cases where providing someone with an advantage would ultimately not make any difference. We must avoid any appearance of trying to exert influence by external means.

The only exceptions to this rule are:

- Gifts which are essentially symbolic and have little intrinsic value and which it is reasonable to offer in exceptional individual cases; cash payments or similar presents are not permissible.
- Invitations to business meals for which the outlay is not excessive.

3. We do not use our position to our personal advantage.

We are strictly opposed to the idea of demanding or accepting some personal advantage when we are engaged in business activities. It makes no difference whether this has an impact on a business decision or not. There must not be the slightest suggestion that an attempt has been made to influence a decision.

The only exceptions to this rule are:

- Gifts which are essentially symbolic and have little intrinsic value and which it is reasonable to offer in exceptional individual cases; cash payments or similar presents are not permissible.
- Invitations to business meals for which the outlay is not excessive.

4. We treat all information from the company as confidential. If something is confidential, that's how we treat it! We don't pass on in-house information or documentation to outside parties – even after we have left the company.

There are certain exceptions to this rule:

- Personnel who are duly authorised to communicate information or provide documentation.
- Information which has already been published or publicly endorsed by the METRO.

If we receive an external inquiry, we refer the inquirer to our competent in-house colleagues

5. We respect the rules of fair competition.

We comply with antitrust regulation! We don't engage in price-fixing, nor do we enter into agreements on dividing up markets or market shares with our competitors or suppliers. We are not permitted to communicate to our competitors any matters that are confidential or competition related or which have not been made public. Furthermore, we do not use or communicate to third parties any confidential information concerning our competitors.

6. We treat everyone as equals.

We are totally committed to tolerance, diversity and equal opportunity. That applies to each of us. We are strictly opposed to any form of discrimination on grounds of race, ethnic origin, religion, ideology, disablement, age, sexual orientation and identity or gender. This also includes any type of harassment (e.g. bullying or sexual harassment). It goes without saying that this applies not just to activities within the company but also to our dealings with third parties. If we ever find ourselves in a discriminatory situation, or hear about one, we should immediately get in touch with a line manager or our Compliance Officer. Incidents may also be entered into the Compliance Reporting System.

7. We are a fair employer.

We are committed to creating fair working conditions at all locations worldwide. Fairness means, for example, respecting the right of employees to organise themselves within the framework of national rights and legislation. We abide by all labour-law provisions and regulations.

8. We respect all legal provisions and regulations.

Whatever we do, we do it on the basis of law, justice and the relevant corporate directives. If an instruction from a line manager infringes current legislation, it does not have to be obeyed. To ensure that we conduct ourselves correctly, we familiarise ourselves with the legislation, regulations and directives which are of importance to us and we keep up to date with any innovations or amendments.

Your contact persons

Have you any questions about Compliance? Would you like to point something out but are unsure who to consult? METRO's Compliance Organisation is there to help you whenever you need it!

Compliance Officer

More than 70 Compliance Officers are deployed in our sales divisions and cross-divisional service companies. Your company's Compliance Officer will be pleased to answer your questions and take note of any information you provide. If you don't know your Compliance Officer, your line manager will help you to get in touch with him/her.

Compliance Reporting System

You will find the Compliance Reporting System in the internet at:

<https://www.metroag.de/en/company/compliance>