CORPORATE RESPONSIBILITY REPORT 2019/20

#NEW SUSTAINABLE

TIME FOR MORE SUSTAINABILITY

METRO

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METRO SUSTAINABLE

DEAR READERS,

The past financial year was a remarkable year. In many respects, but especially with regard to the effects of the Covid-19 pandemic. We witness how the entire economic and social landscape is being disrupted, be it by economic and social constraints, uncertainty and concern about the future, but also by new ways of working together and mutual support.

Against the background of unimagined economic challenges for our business and thus for all the people who work with and for us, it is more important than ever for us to keep an eye on the well-being of our customers and partners as well as social interaction with one another. It is a question of maintaining a balance between what is so urgently needed economically – continuing the business with great commitment, supporting our customers and stimulating the economy again – and what is expected of us as a responsible company from a social and environmental point of view. Like a magnifying glass, the pandemic has brought to light a wide range of circumstances which, under massive pressure, are now clearly showing their impact: whether it is disrupted supply chains, the effects of climate change and the threat to biodiversity as a risk to a secure supply of resources in the future, as well as the particular importance of trade as a supplier and the benefits of digital solutions for our customers or the way we work together.

Times like these hold great opportunities in addition to all the challenges. May those be opportunities to pause for a moment, to make people aware of what they take for granted and what they have missed out on or to rethink and adapt concepts. More than ever, we need to set an example for responsible behavior towards the planet and for a caring coexistence. It is ultimately and above all, a chance for a new approach – an approach towards an improvement of the “new normal”. Because now is the time: time for more sustainability.

In this report we are proud to present the fruits of initiatives that we have long fostered and nurtured. To this end, we present new projects that were started or continued in the last financial year despite or even in view of the effects of the Covid-19 pandemic. METRO succeeds in all of this together with our roughly 98,000 very engaged employees as well as our customers and all other partners in our value chain. The Sustainability Agenda 2030 and the principles of the United Nations Global Compact provide us with the global framework. Based on our sustainability approach METRO SUSTAINABLE, our sustainability strategy translates this into our operational business. Our focus areas range from sustainable procurement and product assortment on our shelves up to the debate about innovative products for more conscious consumption. We work on a wide range of climate protection measures and more diversity among our employees and join forces with our partners along the supply chain in our efforts to protect human rights and combat food waste.

This is how we work on our sustainable business model and on making the “new normal” more sustainable: united in responsibility and aware of the possibilities that change brings.

The Management Board of METRO AG

BUSINESS MODEL

METRO is a leading international specialist in food wholesale. The group is headed by METRO AG, which acts as the central management holding company. It performs group management functions, among others in the areas of finance, controlling, legal and compliance as well as purchasing and human resources. Central management and administrative functions for METRO are anchored within METRO AG.

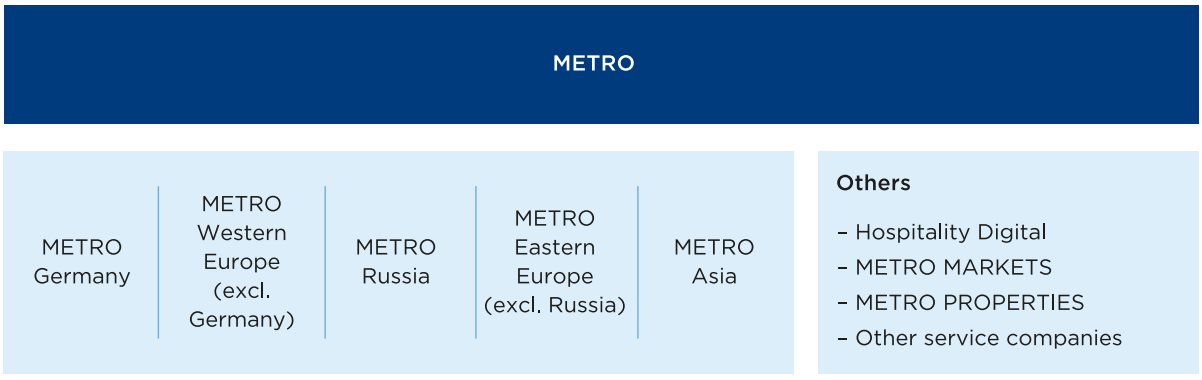
In its core wholesale business, METRO operates globally with 678 stores in 24 countries. METRO is active with the delivery business (Food Service Distribution, FSD) in another 10 countries. It includes the METRO delivery service as well as the delivery specialists Classic Fine Foods, Pro à Pro and Rungis Express.

The core customer groups of METRO are HoReCa and Traders. The HoReCa section includes hotels, restaurants, bars and cafés as well as catering companies, canteen operators and street food vendors. The Traders section includes small grocery stores, kiosks as well as petrol stations and other wholesalers.

Across all customer groups, the majority of customers are small and medium-sized companies as well as sole traders. METRO wants to assist them with their business challenges by providing them with sustainable solutions with superior added economic value, which we have combined under the Wholesale 360 approach.

The group's digitalisation activities are bundled under the Others segment. They mainly comprise the activities of the Hospitality Digital and METRO MARKETS business units. The Others segment also includes the service companies METRO PropertieS, METRO Logistics, METRO-NOM, METRO Advertising and METRO Sourcing. These companies provide real estate, logistics, IT, advertising and procurement services.

Overview of METRO



GLOBAL CHALLENGES

The global challenges which our society is facing also have an impact on METRO and its segments. After all, providing high-quality products and services to customers all over the world is our core business. The basis for this is an intact environment and the availability of resources.

Growing global population

Global population growth is one of the biggest challenges as it impacts resource consumption, the climate as well as the food availability and nutrition situation. According to forecasts by the United Nations, approximately 9.7 billion people will live on earth by 2050. In order to meet their needs, agriculture will have to produce nearly 50% more food, animal feed and biofuels in 2050 than in 2012.

Also, with increasing prosperity, eating habits change as well. There will be an increase in the need for meat, for example, a production particularly resource-intensive.

9.7 billion people in 2050

(Source: United Nations)

83 Annual increase of people in millions

(Source: United Nations)

Increase in the global population by 2050

+26%

(Source: United Nations)

Required increase in harvest yields by 2050

+100%

Due to growing prosperity and hence a rising need for animal proteins and energy (Univesity of Minnesota)

(Source: researchgate)

Growing consumption of resources

1.6 EARTHS

equired to cover our resource consumption. Due to the COVID-19 pandemic induced lockdowns resource consumption and emissions decreased compared to previous years which stated 1.7 earths required. Consequently, also the 2020 earth overshoot day is days later in comparison to 2019.

(Sources: Global Footprint Network, WWF, UN, Earth Overshoot Day)

We already today consume considerably more resources per annum than our planet can provide sustainably. If this consumption rate continued unabated, by 2050 we will need 3 planets like the earth to meet the demand for resources. The pressure on the earth's sustainability is mounting.

In the long run, METRO can only safeguard the foundations of its business if it manages to separate conventional growth in pure economic terms from the resource requirements. Instead, sustainable growth focuses on qualitative growth through sustainable value creation. Sustainable business for us therefore means improving our 'foodprint' while minimising our footprint. In this manner, we generate added value for our customers and strive to give our contribution to mastering global challenges in society as a whole. We are working towards meeting those challenges by living up to our sustainability approach METRO SUSTAINABLE and by acting upon our 8 strategic sustainability focus areas ▸ page 26 we strive to drive operational excellence in a sustainable way.

GLOBAL FRAMEWORK

We are guided by the 17 United Nations Sustainable Development Goals (SDGs) and the 10 principles of the United Nations Global Compact. These we consider our global yet concrete framework when it comes to sustainable action.

Our wide range of activities and the interrelationship between individual projects and the individual SDGs lead to the effect that our sustainability activities contribute to the 17 goals of the global agenda.

As a member of the UN Global Compact Initiative since 2010, we integrate the 10 UNGC principles into our daily work, strategy and corporate culture.

UN GLOBAL COMPACT
COMMUNICATION ON PROGRESS

SUSTAINABLE DEVELOPMENT GOALS

Our sustainability focus areas support the SDGs, particularly Goal 2 (Zero Hunger), Goal 8 (Decent Work and Economic Growth), Goal 12 (Responsible Consumption and Production), Goal 13 (Climate Action) and Goal 17 (Partnerships for the Goals) and play a part in achieving them.

By taking these frameworks into account, we emphasise our conduct as a responsible company with global and local operations. METRO sees itself as value-generating part of society and as such plays an active part in achieving sustainable development on an economic, social and environmental level.

OUR SUSTAINABILITY APPROACH

Our society is more exposed than ever to economic, environmental, social and cultural challenges. But we are also convinced that sustainability is the key to transforming these challenges into opportunities.

METRO SUSTAINABLE is the framework for and driver of our actions towards customer sustainability. It means placing METRO at the core of transforming and driving responsible and sustainable business – at our own business but most importantly along our supply chain and with our customers.

By bringing our needs and ambitions in line with the needs of nature, people and future generations, we can provide METRO with long-term prospects for prosperity and overcome the conventional limits to growth for ourselves, our stakeholders and society as a whole.

Embedding sustainability

Sustainability means more to us than concentrating on ecological and social issues: sustainability is a question of attitude and a way of working. It drives how we do business and is an integral part of our corporate strategy. We strive to enable our employees to understand the significance of sustainability with respect to both themselves and their professional environment, and to conduct themselves accordingly.

While METRO may be able to drive the issue in a top-down approach, each one of the approximately 98,000 employees is our ambassador and can effectively contribute to our impact on sustainability.

To integrate sustainability aspects into relevant business processes and decision-making processes our company has various measures and tools available for advancing the sustainability embedding process:

- Approaches to responsible company management and acting with integrity, including our sustainability approach ▸ page 9 METRO SUSTAINABLE, our Guiding Principles, our Code of Conduct and our corporate governance and compliance structures
- Principles, self-commitments and positions ▸ page 53 as well as sustainability-related targets that provide directional guidance and include compliance with laws as well as meeting additional requirements. One example is our overarching Policy for Human Rights. We are committed to complying with internationally recognised human rights – not just within our own operations, but also along our entire value chain.

- Guidelines such as the 10 principles of the United Nations Global Compact and the Sustainable Development Goals ▸ page 8
- Linking the remuneration paid to the Management Board and the global senior management with the assessment of the sustainability performance ▸ page 30 of METRO in the rating of the Dow Jones Sustainability Index (DJSI) and the achievement of certain sustainability related targets
- Involving our employees via our quarterly employee survey, various sustainability activities for example on UN Sustainable Gastronomy Day as well as via our social network platform

METRO Voice it!

- Employee development programmes that integrate sustainability issues such as our ambassador programme METRO SUSTAINABLE Leadership Programme.
- Memberships in associations and initiatives as well as committee work; the most important memberships are listed here
- Collaboration and dialogue with decision-makers in politics and society.

METRO SUSTAINABLE LEADERSHIP PROGRAM

Sustainability management

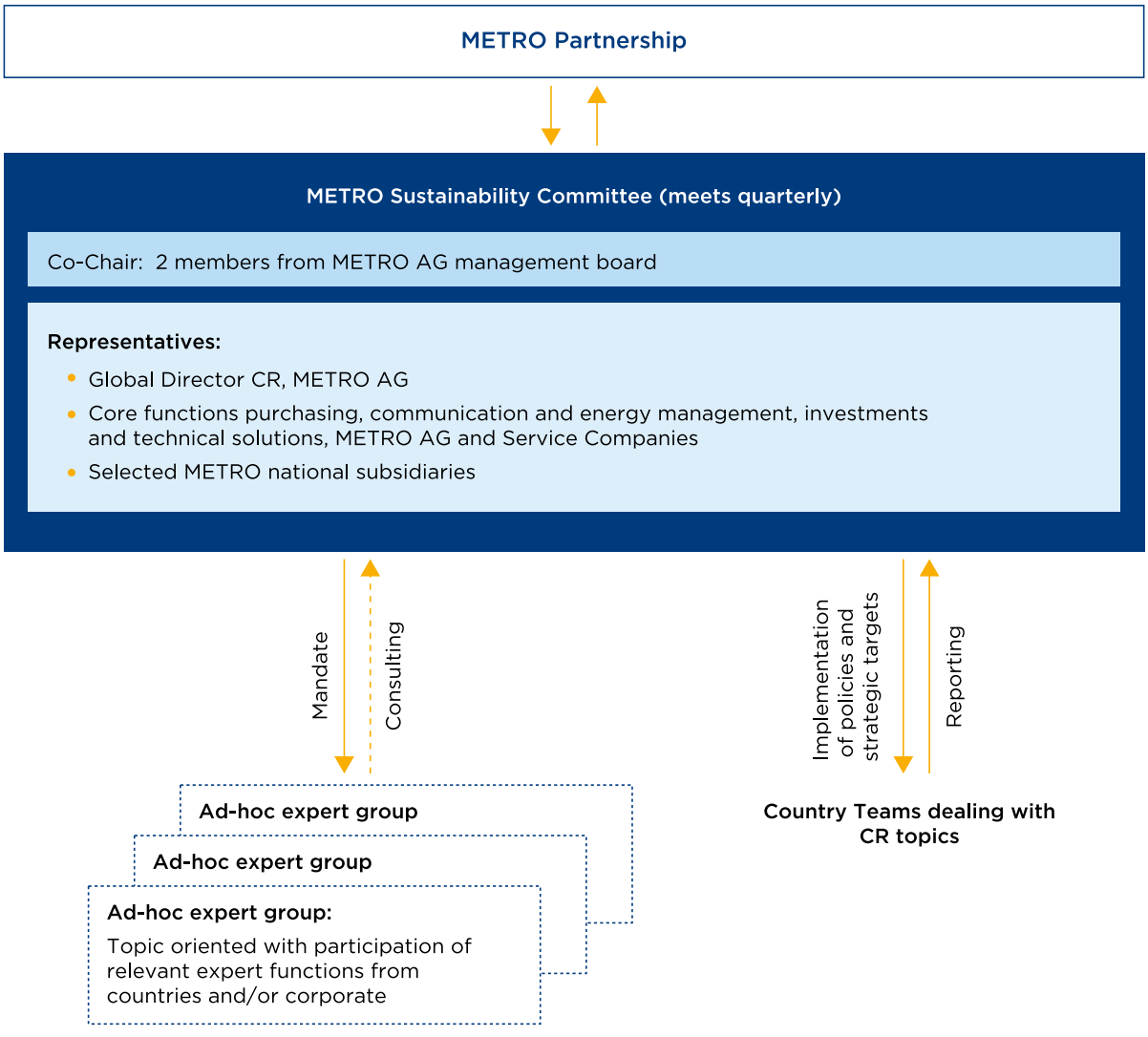
Following the strategy of METRO AG the notion of sustainability is systematically and organisationally anchored in our core business. The sustainability management takes into account reciprocal effects between economic, environmental and social aspects in an efficient and solution-oriented manner and involves the management board. On the one hand through the work of the sustainability committee on the other hand for example through linking the remuneration paid to the Management Board and the global senior management with the assessment of the sustainability performance of METRO in the rating of the DJSI.

The Sustainability Committee sets the strategic framework, defines group-wide objectives and facilitates the exchange of information on sustainability issues at the highest level – also with external input by guest speakers. To adequately respond to the specific market and customer requirements, the METRO companies manage the operational implementation of sustainability within this framework. They are responsible for working on the relevant sustainability issues, for defining and implementing specific targets and measures and for monitoring their success.

The committee is chaired by 2 representatives from the top management, who are regularly rotated. Other members of the committee are:

- People in charge of corporate responsibility at METRO AG
- Representatives of the core functions purchasing, communication as well as energy management, investments and technical solutions
- Representatives of the METRO national subsidiaries

Through the formal notification and assessment of sustainability-related risks and opportunities, sustainability management is closely linked to our risk and opportunity management system. This means that the Management Board is in a position to systematically identify, analyse and manage any deviations from our sustainability targets, in other words to manage risks and opportunities.



STRATEGY

SUSTAINABILITY STRATEGY

Based on our business approach Wholesale 360 and within the framework of our sustainability approach METRO SUSTAINABLE we pursue our operational sustainability strategy. This strategy focusses on what is material for us, in order to ensure that our sustainability activities address the aspects and issues that most affect our business and that we can leverage through our business activities – together with our customers and partners. With our emphasis on the food sector, we concentrate our work on 8 sustainability focus areas ▸ page 26.

We can change the game for a sustainable future when collaborating on food waste solutions, finding answers for a varied balance of proteins for more conscious consumption and putting more organic and responsible products on our shelves. At the same time, we are aware of our responsibility and opportunities when promoting human rights, innovating on packaging and plastic materials, contributing to positive climate action, driving change in sustainable raw material sourcing and fostering diversity and inclusion.

Covid-19 has not resulted in any fundamentally new topics for us to consider in our strategy. However, challenges and opportunities related to our focus areas have become more prominent during the pandemic.

With METRO SUSTAINABLE and our work on the strategic focus areas we contribute to the sustainability of communities worldwide. This is achieved in particular through discourse with internal and external stakeholders such as employees, customers, suppliers and business partners, local communities, non-governmental organizations (NGOs), political representatives, investors, competitors and committees. As an innovation driver for sustainable solutions, we also contribute to a sustainability movement. Through information, inspiration, motivation and support from our employees, customers and partners, our sustainable action has the potential to reach millions of people and makes an impact for increased sustainability. Being part of something creates a very strong feeling of togetherness. That is how we all can drive the change.

MATERIALITY ANALYSIS 2019/20

In the course of financial year 2019/20 we have verified our sustainability topics resulting from the materiality analysis 2017/18 in accordance with the requirements of § 289c of the German Commercial Code and the reporting standard of the Global Reporting Initiative (GRI). The assessment of the issues was carried out by the members of the Sustainability Committee on the basis of the legally required materiality definition and by the experts of METRO's Corporate Responsibility department using the GRI criteria. The result of the verification, taking into account the two dimensions of METRO's influence on the topic and stakeholder relevance, comprises 18 key issues.

1. Fundamental principles and rights in the workplace
2. Compliance with human rights in our own business
3. Human rights and fair working conditions along the value chain
4. Employability
5. Human capital development
6. Compliance
7. Customer relationship and innovation management
8. Diversity and equal opportunities
9. Health and safety at work
10. Data protection
11. Supplier development
12. Sustainable economic development
13. Energy consumption in our own business
14. Food Waste in our own business
15. Organic and Responsible Products
16. Conscious Proteins
17. Raw Material Sourcing
18. Packaging and Plastic.

Of these 18 topics, 14 were already material in accordance with §289c German Commercial Code – taking into account the two perspectives of business relevance and METRO's influence on the topic. These topics were accordingly addressed in the non-financial statement in METRO's annual report. In addition, certain sustainability-related aspects of these topics, which are essential according to the German Commercial Code (HGB), are also highlighted in the CR Report insofar as they are related to the strategic focus topics of our sustainability strategy.

Information on the management approaches to the 18 material topics can be found below. Further information can be found in the GRI Content Index ▸ page 60.

Fundamental Principles and Rights in the Workplace

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership CRR: Materiality analysis 2019/20 UN GC – Human rights and labour standards
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership UN GC – Human rights and labour standards
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership UN GC – Human rights and labour standards

Compliance with Human Rights in our Own Business

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Employee interests – Respect for human rights CRR: Materiality analysis 2019/20 CRR: Management approach CRR: Our focus areas – Human Rights CRR: Commitments, positions and targets – Human Rights UN GC – Human rights and labour standards
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Employee interests – Respect for human rights UN GC – Human rights and labour standards
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Employee interests – Respect for human rights UN GC – Human rights and labour standards

Human Rights and Fair Working Conditions along the Value Chain/Human Rights

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Employee interests – Respect for human rights AR: Combined non-financial statement of METRO AG – Employee interests – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Materiality analysis 2019/20 CRR: Management approach CRR: Our focus areas – Human Rights CRR: Commitments, positions and targets – Human Rights UN GC – Human rights and labour standards
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Respect for human rights AR: Combined non-financial statement of METRO AG – Employee interests – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach CRR: Our focus areas – Human Rights CRR: Commitments, positions and targets – Human Rights UN GC – Human rights and labour standards
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Respect for human rights AR: Combined non-financial statement of METRO AG – Employee interests – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach CRR: Our focus areas – Human Rights CRR: Commitments, positions and targets – Human Rights UN GC – Human rights and labour standards

Employability

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Employee interests CRR: Materiality analysis 2019/20
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests

Human Capital Development

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Employee interests – Training and development CRR: Materiality analysis 2019/20
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Training and development
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Training and development

Compliance

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery CRR: Materiality analysis 2019/20 UN GC – Anti-corruption measures
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery UN GC – Anti-corruption measures
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery UN GC – Anti-corruption measures

Customer Relationship and Innovation Management

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Customer satisfaction and innovation management CRR: Materiality analysis 2019/20
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Customer satisfaction and innovation management
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Customer satisfaction and innovation management

Diversity and Equal Opportunities/Diversity and Inclusion

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Employee interests – Diversity and Inclusion AR: Combined non-financial statement of METRO AG – Employee interests – Equal opportunities at work CRR: Materiality analysis 2019/20 CRR: Management approach CRR: Our focus areas – Diversity and Inclusion CRR: Commitments, positions and targets – Diversity and Inclusion UN GC – Human rights and labour standards
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Diversity and Inclusion AR: Combined non-financial statement of METRO AG – Employee interests – Equal opportunities at work CRR: Management approach CRR: Our focus areas – Diversity and Inclusion CRR: Commitments, positions and targets – Diversity and Inclusion UN GC – Human rights and labour standards
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Diversity and Inclusion AR: Combined non-financial statement of METRO AG – Employee interests – Equal opportunities at work CRR: Management approach CRR: Our focus areas – Diversity and Inclusion CRR: Commitments, positions and targets – Diversity and Inclusion UN GC – Human rights and labour standards

Health and Safety at Work

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety and health management AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety AR: Combined non-financial statement of METRO AG – Employee interests – KPIs for occupational safety and health AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety in times of Covid-19 CRR: Materiality analysis 2019/20 UN GC – Human rights and labour standards
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety and health management AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety AR: Combined non-financial statement of METRO AG – Employee interests – KPIs for occupational safety and health AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety in times of Covid-19 UN GC – Human rights and labour standards
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety and health management AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety AR: Combined non-financial statement of METRO AG – Employee interests – KPIs for occupational safety and health AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety in times of Covid-19 UN GC – Human rights and labour standards

Data Protection

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Protection of personal data CRR: Materiality analysis 2019/20
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Protection of personal data
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Protection of personal data

Supplier Development

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Materiality analysis 2019/20 CRR: Management approach CRR: Our focus areas – Raw Material Sourcing CRR: Commitments, positions and targets – Raw Material Sourcing UN GC – Human rights and labour standards UN GC – Environmental protection
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach CRR: Our focus areas – Raw Material Sourcing CRR: Commitments, positions and targets – Raw Material Sourcing UN GC – Human rights and labour standards UN GC – Environmental protection
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach CRR: Our focus areas – Raw Material Sourcing CRR: Commitments, positions and targets – Raw Material Sourcing UN GC – Human rights and labour standards UN GC – Environmental protection

Sustainable Economic Development

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – METRO SUSTAINABLE AR: Combined non-financial statement of METRO AG – Actively managing sustainability CRR: Materiality analysis 2019/20 CRR: METRO SUSTAINABLE CRR: Management approach
103-2	The management approach and its components	AR: Goals and strategy AR: Combined non-financial statement of METRO AG – METRO SUSTAINABLE AR: Combined non-financial statement of METRO AG – Actively managing sustainability CRR: Management approach CRR: My sustainable Restaurant
103-3	Evaluation of the management approach	AR: Goals and strategy AR: Combined non-financial statement of METRO AG – METRO SUSTAINABLE AR: Combined non-financial statement of METRO AG – Actively managing sustainability CRR: Management approach CRR: My sustainable Restaurant

Energy Consumption in our Own Business/Climate Action

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Environmental matters CRR: Materiality analysis 2019/20 CRR: Management approach CRR: Our focus areas – Climate Action CRR: Commitments, positions and targets – Climate Action UN GC – Environmental protection
103-2	The management approach and its components	CRR: Management approach CRR: Our focus areas – Climate Action CRR: Commitments, positions and targets – Climate Action UN GC – Environmental protection
103-3	Evaluation of the management approach	CRR: Management approach CRR: Our focus areas – Climate Action CRR: Commitments, positions and targets – Climate Action UN GC – Environmental protection

Food Waste

103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20
		CRR: Management approach
		CRR: Our focus areas – Food Waste
		CRR: Commitments, positions and targets – Food Waste
		AR: Combined non-financial statement of METRO AG – Food Waste
		UN GC – Environmental protection
103-2	The management approach and its components	CRR: Management approach
		CRR: Our focus areas – Food Waste
		CRR: Commitments, positions and targets – Food Waste
		UN GC – Environmental protection
103-3	Evaluation of the management approach	CRR: Management approach
		CRR: Our focus areas – Food Waste
		CRR: Commitments, positions and targets – Food Waste
		UN GC – Environmental protection

Organic and Responsible Products

103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20
		CRR: Management approach
		CRR: Our focus areas – Organic and Responsible Products
		CRR: Our focus areas – Raw Material Sourcing
		CRR: Our focus areas – Conscious Proteins
103-2	The management approach and its components	CRR: Management approach
		CRR: Our focus areas – Organic and Responsible Products
		CRR: Our focus areas – Raw Material Sourcing
		CRR: Our focus areas – Conscious Proteins
103-3	Evaluation of the management approach	CRR: Management approach
		CRR: Our focus areas – Organic and Responsible Products
		CRR: Our focus areas – Raw Material Sourcing
		CRR: Our focus areas – Conscious Proteins

Conscious Proteins

103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 CRR: Management approach CRR: Our focus areas – Conscious Proteins CRR: Commitments, positions and targets – Conscious Proteins
103-2	The management approach and its components	CRR: Management approach CRR: Our focus areas – Conscious Proteins CRR: Commitments, positions and targets – Conscious Proteins
103-3	Evaluation of the management approach	CRR: Management approach CRR: Our focus areas – Conscious Proteins CRR: Commitments, positions and targets – Conscious Proteins

Raw Material Sourcing

103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Materiality analysis 2019/20 CRR: Management approach CRR: Our focus areas – Raw Material Sourcing CRR: Commitments, positions and targets – Raw Material Sourcing UN GC – Human rights and labour standards UN GC – Environmental protection
103-2	The management approach and its components	CRR: Management approach CRR: Our focus areas – Raw Material Sourcing CRR: Commitments, positions and targets – Raw Material Sourcing UN GC – Human rights and labour standards UN GC – Environmental protection
103-3	Evaluation of the management approach	CRR: Management approach CRR: Our focus areas – Raw Material Sourcing CRR: Commitments, positions and targets – Raw Material Sourcing UN GC – Human rights and labour standards UN GC – Environmental protection

Packaging and Plastics

103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 CRR: Management approach CRR: Our focus areas – Packaging and Plastic CRR: Commitments, positions and targets – Packaging and Plastic UN GC – Environmental protection
103-2	The management approach and its components	CRR: Management approach CRR: Our focus areas – Packaging and Plastic CRR: Commitments, positions and targets – Packaging and Plastic UN GC – Environmental protection
103-3	Evaluation of the management approach	CRR: Management approach CRR: Our focus areas – Packaging and Plastic CRR: Commitments, positions and targets – Packaging and Plastic UN GC – Environmental protection

MANAGEMENT APPROACH

Statements on how we deal with issues that have been identified as material according to the German Commercial Code (HGB) and which are therefore also considered material according to GRI can be found in the Non-Financial Statement (NFS) of the Annual Report 2019/20 and are not dealt with separately here. These include explanations of human resources strategy and development, the implementation of fair and safe working conditions in compliance with human rights within the business, the promotion of diversity and inclusion, information on the implementation of compliance and the protection of personal data, as well as statements on customer satisfaction and innovation management. In addition, the NFE contains information on topics that have an overlap with our 8 sustainable focus areas ▸ page 26 (Food Waste, Organic and Responsible Products, Conscious Proteins, Raw Material Sourcing, Packaging and Plastic, Climate Action, Human Rights and Diversity and Inclusion), including Human rights and fair working conditions in the value chain, diversity and equal opportunities, supplier development, sustainable economic development, energy consumption in our own operations and food waste in our own operations. These aspects are addressed within the 8 topics and are addressed below.

A detailed overview of where statements on management approaches are made with regard to the key topics can be found in the GRI Content Index ▸ page 60.

Under METRO SUSTAINABLE we consider 8 strategic focus topics ▸ page 26 under which we subsume our activities related to our main topics The key focus areas include Food Waste, Organic and Responsible Products, Conscious Proteins, Raw Material Sourcing, Packaging and Plastic, Climate Action, Human Rights and Diversity and Inclusion. Those cover all aspects along the value chain that are important from a sustainability perspective – from sustainable sourcing and sustainable business operations to sustainable products and sustainable consumption, disposal or recycling up to the responsible interaction with people at the individual stages. We manage those focus areas because, we as wholesalers in the food sector, have influence on them with the ultimate goal of supporting our customers in transforming their own businesses towards sustainable business.

To make sure we conduct our core business successfully and satisfy the needs of our customers, we need energy and natural resources today as well as tomorrow. By taking a responsible approach to our use of finite resources such as fossil fuels and other raw materials, we can directly influence the cost of our business activities, anticipate future environmental regulations and make a contribution to the protection of the climate and resources.

Resource protection is also a key factor in the supply chain, particularly in the area of responsible sourcing and product range composition. As a retail company, we depend on resources being available in the long term. Because on the one hand the resources are directly the product we sell, on the other hand the raw materials are needed for the production of the products we offer and their packaging. To be able to protect resources, it is crucial to know their origin and the circumstances under which they were gained. Therefore, we are committed to transparent sourcing along the entire value chain, with the aim of generating added value for our customers through traceability. By introducing traceability and ensuring that our products are sourced responsibly, we are able to supply our customers with high-quality products, appropriate services and goods that are produced in the most socially responsible, environmentally sound and resource-friendly manner possible.

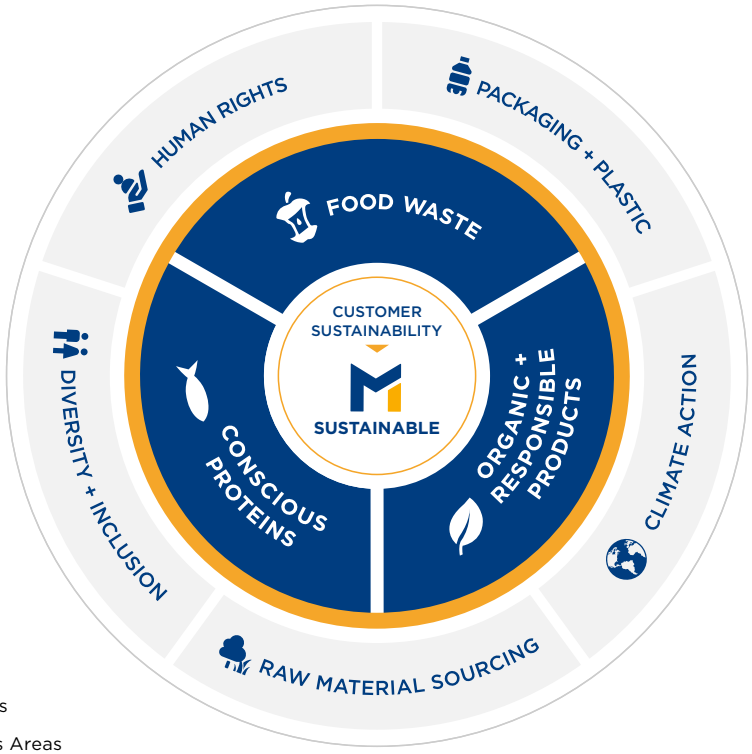
In doing so, we are also strengthening local producer structures and regional development. Additionally, we pass our expertise in the fields of resource management, procurement and product range composition on to our partners, independent entrepreneurs, in order to generate long-term business perspectives and a competitive edge for them and for us. This is how we secure our future and promote sustainable procurement processes and responsible consumption.

In the area of human rights, we are committed to respecting all human rights as formulated in the Universal Declaration of Human Rights of the United Nations (UN) and in the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO). This obligation refers to both our own employees and our business partners in our value chain. By ensuring decent living and working conditions, we want to take over responsibility in the supply chain. We respect, protect and support our employees. We enable them to integrate sustainability systematically into their everyday work and decisions. This is how we create a sustainable, attractive working environment that enables our employees to develop good working relationships with suppliers and offer our customers optimum, sustainable solutions that meet their needs.

In this way, we demonstrate how sustainable action is indispensable for future-proof business.

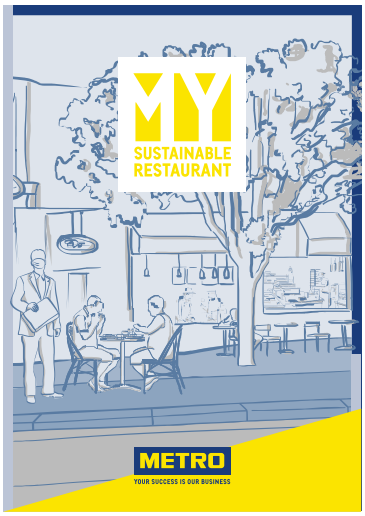
Our focus areas

METRO SUSTAINABLE is the **framework** for and **driver of our actions towards customer sustainability**. It means placing METRO at the **core of transforming and driving responsible and sustainable business** – at our own business but most importantly along our supply chain and with our customers. We want to **share our knowledge** and show how suppliers and customers **benefit from sustainable choices**. They can profit, for example, in terms of energy efficiency and improved waste management and the resulting opportunities related to lower costs, better products with higher margins, new customer groups and a competitive edge. They profit from more efficiency hence less costs, better products with higher margins, new customer groups and a way ahead of competitors.
To make our approach METRO SUSTAINABLE directly tangible and realizable for our customers, we transferred it to the concept of "My sustainable Restaurant" – a pragmatic guidance to promote sustainable gastronomy.



Click the wheel to explore

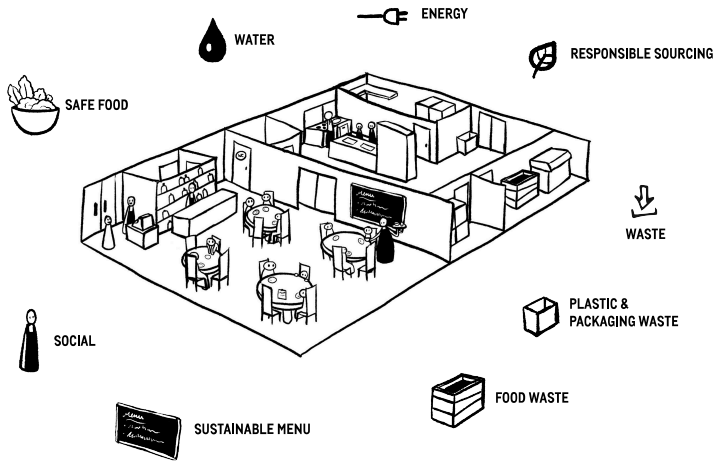
MY SUSTAINABLE RESTAURANT



METRO is here to support our customers' business success. Our purpose is to help our professional customers run profitable businesses which have a positive impact on their communities and the environment. With around one in three meals being eaten out of home our customers impact can be huge.

Consumers are increasingly aware of the environmental and societal issues related to sustainable development. They have changed the way they consume both at home and in restaurants. Faced with these findings, food businesses must adapt.

METRO therefore has worked out a guiding document that takes HoReCa customers through the main sustainability issues of interest for gastronomers, touching upon topics like: water, energy, responsible sourcing, waste, plastic & packaging waste, food waste, sustainable menu, social issues and safe food. It gives advice and solutions that customers can directly implement in their own business. Because sustainable gastronomy is about conducting business that thrives in the long term.



More information about "My sustainable Restaurant"

KEY PERFORMANCE INDICATORS AND TARGETS

KEY PERFORMANCE INDICATORS AND TARGETS

Scope

The chapter 'key performance indicators' provides information about METRO's sustainability performance in the form of key performance indicators (KPIs). It is divided into KPIs on the economic performance ▸ page 30 of the company and KPIs on our sustainability focus topics: Organic and Responsible Products ▸ page 31, Climate Action ▸ page 32, Human Right ▸ page 37 s as well as Diversity and Inclusion ▸ page 41. In addition, we report on the KPI community investment ▸ page 52.

Reporting period

The reporting year is the same as the METRO financial year, that is from 1 October to 30 September. Key performance indicators are reported for the previous 3 financial years where data is available.
Reporting of the climate protection target ▸ page 32 also includes the target's reference year, 2011. The figure for the reference year relates to the period from 1 January to 31 December 2011. A different reporting period is used in this case because METRO changed its financial year from the calendar year to the 12 months from October to September in 2013.

Data collection approach and degree of coverage

The key performance indicators reported are based on data that is gathered using various internal reporting systems. As a rule, this data is systematically recorded for each business unit and each country every quarter, in some cases every month. The KPIs are based on data collected for the whole METRO, that is – where applicable – for all of the stores, back offices and warehouses and for the head office in Düsseldorf. It is necessary to extrapolate and estimate consumption data for some KPIs in cases where the primary data available is incomplete. This applies to the KPIs from the section Climate Action ▸ page 32. The sustainability data management office merges the data from various reporting systems. The greenhouse gas emissions relating to purchased goods and services, assets and leased assets which are reported in accordance with Scope 3 are modelled because recording primary data for these is highly complex. This modelling is based on on sales per product category or on other KPIs for the economic value added by METRO. To perform these calculations, we use so-called economic input-output models, which are founded on the economic flows of goods and services.

The selling and delivery space figures used as a basis for the KPIs are averages for the year.

Unless expressly stated otherwise, all presentations in this report refer to continuing operations (excluding the hypermarket business Real and excluding METRO China). We report most of the KPIs separately for METRO as a whole and for the region Germany, as the country in which METRO's headquarter is based. As a general rule, the KPIs for METRO as a whole include the data for all locations or all employees unless stated otherwise in the footnotes of a respective KPI. We do not yet report the key figures on professional continuous development in the Diversity and Inclusion ▸ page 41 section for all employees. We do not have data of sufficient quality for all sales lines and organisational units. However, these key figures on professional continuous development include almost all companies with the exception of a few service companies.

All of the KPIs in this report have been audited ▸ page 106 by KPMG AG Wirtschaftsprüfungsgesellschaft.

Deviations from previous reports

In some cases, the figures presented in previous sustainability reports differ from those cited in this report. There are various reasons for this.
In financial year 2018/19, we retroactively switched to a different emission factor set for energy.

For all representations given, the data for the hypermarket business and METRO China were removed retroactively from the data.

There are other differences in the KPIs in the section Climate Action ▸ page 32, arising from estimated figures having been replaced by actual values. In a number of cases, the utilities provide us with consumption figures quite late, and we therefore initially work on the basis of estimates.

The only deviations are those in comparison with earlier reported numbers. Within the present disclosure, KPIs are represented according to a uniform methodology for 3 years, respectively. They thus allow a comprehensible overview of the development.

We complete our data collection and reporting on an ongoing basis to improve the level of transparency and the way we manage our sustainability performance.

Company

Economic value (value added)

€ million		2018/19[1]	**2019/20**	Change in %
Key financial figures for continuing operations				
Sales development (like-for-like)	%	2.1	**–3.9**	-
Sales development in local currency	%	2.2	**–4.0**	-
Sales (net)		27,082	**25,632**	–5.4
Adjusted EBITDA		1,392	**1,158**	–16.8
Transformation costs		0	**47**	-
Earnings contributions from real estate transactions		339	**3**	–99.2
EBITDA		1,731	**1,113**	–35.7
EBIT		957	**257**	–73.1
EBT (earnings before taxes)		728	**–32**	-
Profit or loss for the period[2]		421	**–146**	-
Earnings per share (basic = diluted)	€	1.16	**–0.40**	-
Dividend per ordinary share		0.70	**0.70**[3]	-
Dividend per preference share		0.70	**0.70**[3]	-
Cash flow from operating activities		1,209	**646**	–46.6
Investments		826	**627**	–24.1
Net debt		5,419	**3,771**	–30.4
Employees (annual average by headcount)		101,654	**97,639**	–3.9

[1] Adjustment of previous year due to full retrospective application of IFRS 16 (Leases).

[2] Attributable to METRO shareholders.

[3] Subject to the resolution of the Annual General Meeting.

Evaluation in relevant sustainability indices and rankings

Index/ranking	Rating/score	Scale	Publication date
Dow Jones Sustainability Index (DJSI) World/Europe	**81 Index member**	0 to 100	11/2020
ISS-oekom Corporate Rating	**C+ Prime Status**	D– to A+	04/2020
CDP Climate Scoring	**A**	F to A	12/2020
CDP Water Scoring	**B**	F to A	12/2020
CDP Forest Scoring	**B (palm oil, paper), B– (soy), C (cattle)**	F to A	12/2020
FTSE4Good Global/Europe Index	**Index member**	-	06/2020
MSCI	**Index member**	-	-

Explanation: As part of our stakeholder dialogue, we inform the capital market about our sustainability management activities. This means our sustainability performance is rated by independent third parties.
In financial year 2019/20, METRO was again listed in both the Dow Jones Sustainability Index Europe and World.

As the CDP results were only published in December after the non-financial disclosure had been audited, the CDP rating results shown here differ from the status of the non-financial disclosure.

Organic and Responsible Products

Reformulated products

no. of products[1]	2018/19	**2019/20**
Less of sugar	19	**51**
Less of salt	20	**88**

[1] We define product as each separate product offered to our customers. Sometimes identical products have different GTINs in the different countries where they are sold. In such cases, these identical products are counted only once.

Explanation: Referring to own brand products going through a reformulation process, we are focusing on reducing salt and sugar content in our Own Brand assortment.
Target: METRO-wide reduce min. 5% sugar/salt content in at least 60 common sourced products and 1,000 locally sourced products by December 2021.

Climate Action

Greenhouse gas emissions in t CO_2 (CO_2 equivalents)

t CO_2 (CO_2 equivalents)	Reference year 2011	2017/18	2018/19	**2019/20**
Scope 1 – direct greenhouse gas emissions	494,798	505,619	464,532	**453,269**
Scope 2 – indirect greenhouse gas emissions	931,168	747,637	732,162	**692,034**
Scope 3 – other indirect greenhouse gas emissions	3,669,074	2,899,306	2,714,477	**1,380,826**
Total greenhouse gas emissions	**5,095,039**	**4,152,562**	**3,911,171**	**2,526,129**

Definition: Level of all main emissions by Scope in line with the methodology of the Greenhouse Gas Protocol.
The following sources of emissions are included:

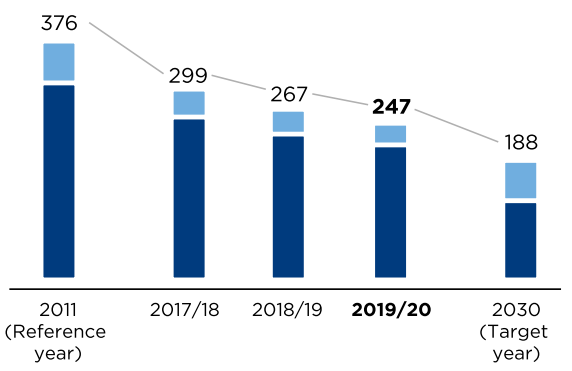
- Scope 1 = fuel oil, natural gas, liquefied natural gas (LNG), liquefied petroleum gas (LPG), refrigerant losses from commercial cooling, refrigerant losses from air-conditioning, fuel consumption of company cars and the group's own logistics fleet, emergency power generators
- Scope 2 = electricity consumption, district heating and cooling
- Scope 3 = external logistics for the transport of goods to our stores and warehouses, in-house paper consumption for advertising and office purposes, business trips, goods and services purchased for own use, capital assets, upstream chain emissions and grid losses for all direct and indirect energy sources, waste, employee commutes, leased assets

Explanation about the Carbon Footprint, especially about methodology, reporting boundaries and climate protection target are available at https://responsibility.metroag.de/focus-areas/climate-action.

Status of climate protection target

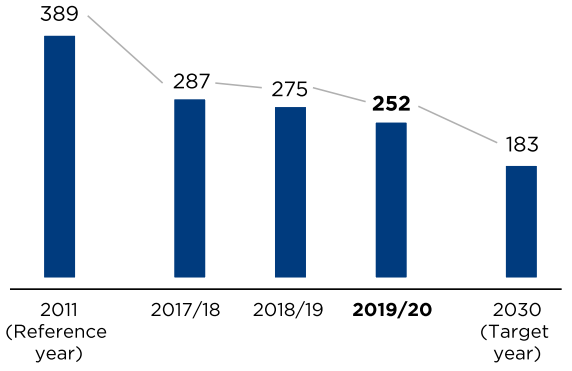
Greenhouse gas emissions in kg CO_2 (CO_2 equivalents) per m^2 selling and delivery space

METRO



Scope 1 & 2
Scope 3
Total

Germany



Total

Definition: Greenhouse gas emissions from METRO's stores, back offices and warehouses (by selling space and space used for delivery operations) included within the climate protection target. Included are the emissions from electricity, heating and cooling energy consumption, also counting upstream chains and grid losses, refrigerant emissions from commercial cooling and air-conditioning, fuel consumption by company cars, in-house paper consumption for advertising material and office purposes as well as business trips.
Status: Compared to the base year 2011 the Scope 1 and Scope 2 CO_2 emissions relevant in the Science Based Target have been reduced by 31.1% per m^2 selling and delivery space.

Explanation: We aim to reduce our specific greenhouse gas emissions by 50% between 2011 and 2030. In concrete terms, this means that we want to cut our emissions per square metres of selling and delivery space from 376 to 188 kg of CO_2 equivalents per annum.

The significant decline in emissions compared with the reference year 2011 can essentially be attributed to 2 factors:

- Measures to reduce consumption relating to energy, company cars, paper and business travel, and to reduce emissions caused by refrigerant loss
- General technical and scientific developments as reflected by the adjustment of the emission factors used to calculate CO_2 equivalents. Above all in electricity generation, the emissions factor in many countries is declining due to the increased share of renewable energies.

In financial year 2018/19, METRO expanded the climate target to the supply chain and as the first German retailer set a recognised Science Based Target for itself. METRO AG undertakes to reduce its Scope-1- and Scope-2-CO_2 emissions by 60% per square metre sales and delivery area by 2030 compared to 2011. Our Scope 1 and Scope 2 targets are consistent with the reductions required to keep global warming well below 2°C by 2100 compared to pre-industrial levels. In addition, METRO AG is committed to reducing absolute Scope 3 CO_2 emissions (supply chain) by 15% by 2030 compared to 2018. In 2020, we conducted the CDP Supply Chain Program Climate with over 120 suppliers to identify scope 3 emissions in our supply chain. In the future, this data will complement our environmental performance indicators. For the 2019/2020 financial year, the CDP supply chain data has not yet been included in our reported key figures.

Trends in the emission sources included in the climate protection target

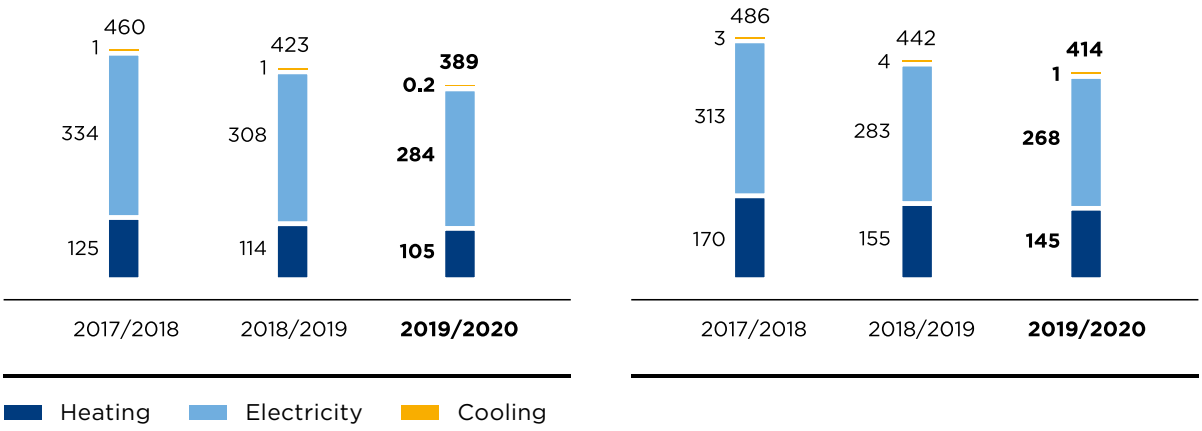
Greenhouse gas emissions in kg CO_2 (CO_2 equivalents) per m^2 selling and delivery space

kg CO_2 (CO_2 equivalents) per m^2 selling and delivery space	Reference year 2011	**2019/20**	Change in %
Paper consumption	14	**4**	–70
Company cars	12	**9**	–29
Business travel	6	**1**	–89
Electricity consumption	244	**157**	–36
Thermal energy consumption	33	**26**	–21
Refrigerant losses	66	**50**	–24
Total	**376**	**247**	**–34**

Definition: Trends in CO_2 emissions per square metre from all the emission sources included in the climate protection target compared to the reference year 2011.

Energy consumption KPIs

Electricity, heating and cooling energy consumption (in kWh per m^2 of selling and delivery space)



Definition: Locations' energy consumption in relation to the space used for sales and delivery operations. Energy consumption consists of electricity consumption and heating and cooling energy consumption (fuel oil, natural gas, liquefied natural gas (LNG), liquefied petroleum gas (LPG), emergency power generators and district heating/cooling).
Target: At our METRO Wholesale sales line, we defined a target to reduce energy consumption by 2030 by 35% with a base year 2011. We reduced electricity consumption in our stores by 7.9% in year-on-year comparison in the past financial year and thus clearly exceeded our target of 3.4%. Effects of Covid-19 could only be observed locally and with small deviations. We cannot quantify the exact impact of the pandemic on our energy consumption performance.

Total Energy consumption

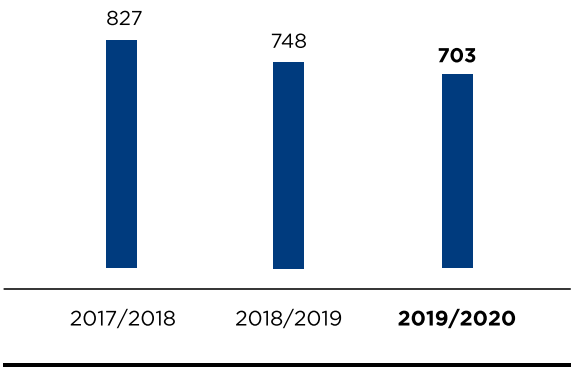
in MWh	2017/18	2018/19	**2019/20**
Fuel (heating oil, gas, petrol, diesel, LPG, LNG)	537,190	523,762	**499,428**
Electricity	1,640,227	1,610,400	**1,523,866**
District heating	75,537	70,648	**64,207**
District cooling	3,143	3,692	**1,299**
Total energy consumption	**2,256,097**	**2,208,502**	**2,088,800**

Definition: Energy consumption for operating the locations and for transportation broken down into the different types of energy used. Fuel includes fuel oil, combustion fuel, natural gas and liquefied natural gas.

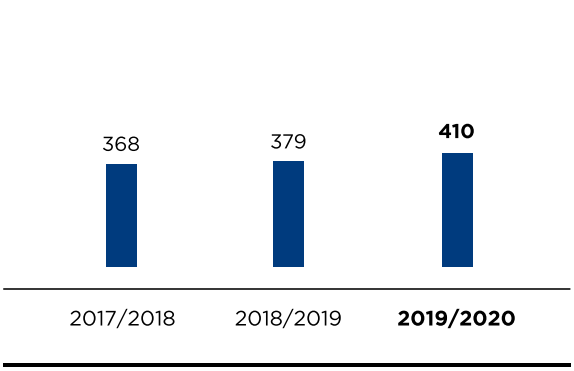
Water

Water withdrawal and wastewater generated (in l per m^2 of selling and delivery space)

METRO



Germany



Definition: Water withdrawal by the locations in relation to the space used for sales and delivery operations.
Explanation: In absolute terms, METRO drew 3.8 million m^3 of fresh water in the reporting period. At the warehouses, stores and back offices, water is primarily used for cleaning and sanitary facilities. In addition to this, water may be used for storing, transporting and selling food, for example for keeping live fish or making ice to chill fresh fish.

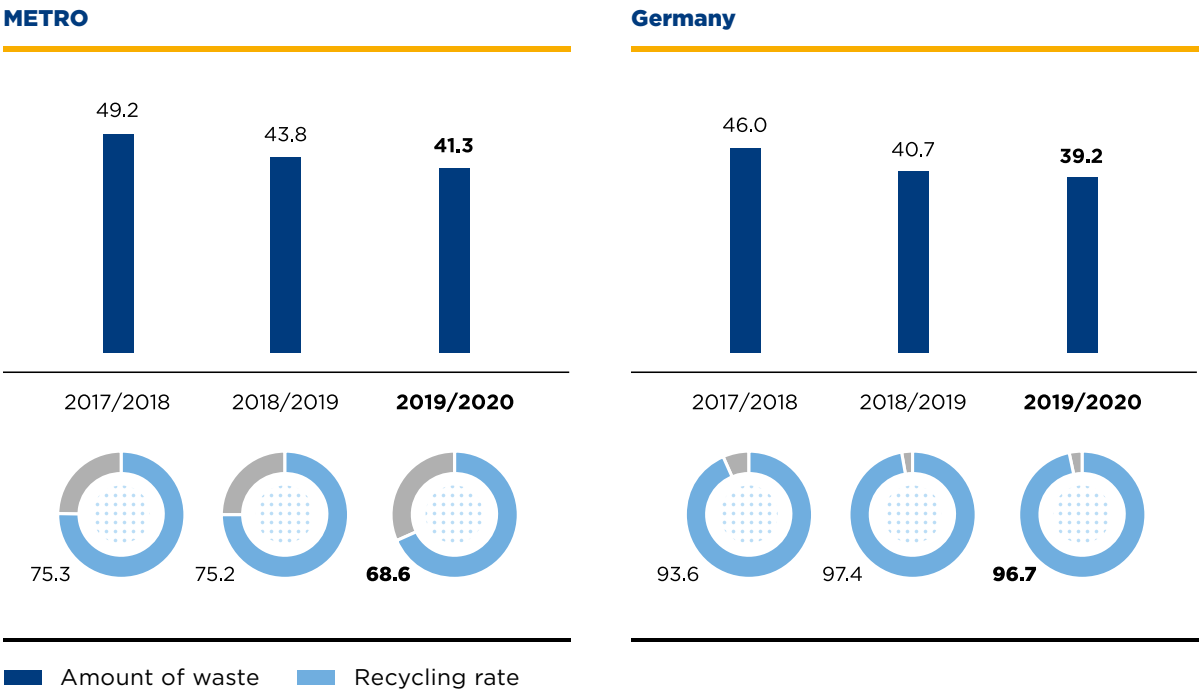
On group level, we measure and monitor the amount of water which the company draws from the public drinking water supply. The public drinking water supply is the only source from which we draw significant amounts of water.

We also measure and monitor the total amount of wastewater we generate at the group level. As our locations do not consume a significant amount of water, our calculations are based on the assumption that the volume of wastewater is the same as the amount of fresh water. All wastewater is fed into public sewers. We do not monitor the quality of the wastewater ourselves as this is not relevant given the usage described above.

Target: At METRO Wholesale the goal was set to save 5% of water by 2025 compared to the base year 2016/17. In 2020, we were able to reduce the consumption in our stores of METRO Wholesale by 6% calculated per square metre of net operating area compared to the previous year.

Waste

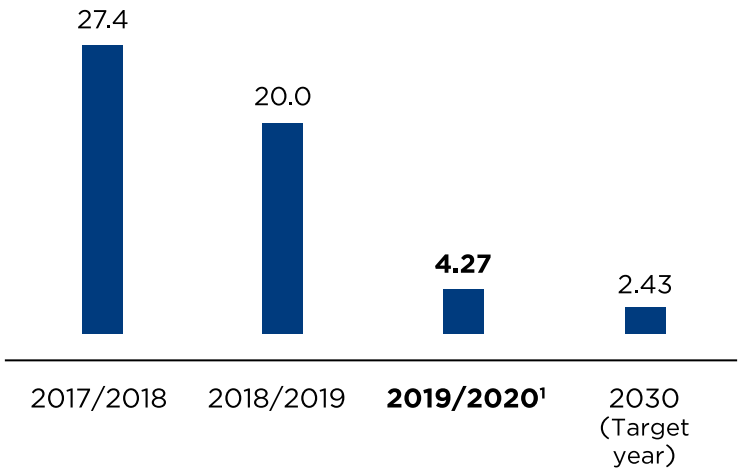
Amount of waste and recycling rate (in kg per m^2 of selling and delivery space and in %)



Human Rights

Lost-time injury frequency rate (LTIFR) per million hours worked

Germany



1 Figure not comparable with the figure in the 2018/19 report due to the change in the reporting system

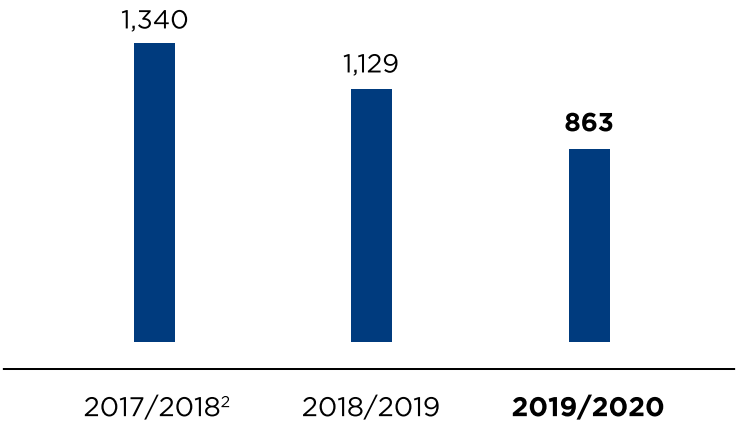
Definition: The LTIFR captures the number of incidents with at least 1 missed day of work (not including the day of the incident) per 1 million hours worked. Fatalities and cases of permanent sick leave or disability are likewise included, whereas accidents while commuting are not.

Explanation: For METRO, we have initiated a group-wide Operational Safety Management System (OSMS) which has been approved by the Management Board in September 2020. It structures the safety environment in accordance with the requirements of ISO 45001 'Management systems for occupational health and safety'. The OSMS manages and controls the interlinked processes of the various business activities at METRO thus METRO is able to fulfil its safety-related obligations as an operator. As of business year 2020/21 the system will apply METRO group wide. Already in February 2020, the OHS reporting manual was launched as a pilot project to be cascaded to all entities as a part of the Operational Safety Management System implementation. Currently, the vast majority of METRO countries regularly report in the new format with the improved methodology of compiling and calculating work-related injuries.

Producers in risk countries

Risky Non-Food Producers

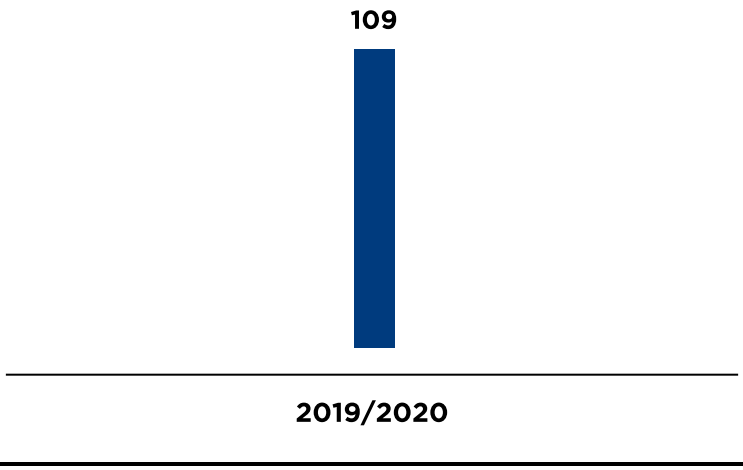
Non-Food Producers[1] in risk countries (number)



1 This includes producers of commercial goods (non-food own brands and own imports) who carry out the last decisive and value-giving production step.
2 Figures presented here include Real and METRO China.

Risky Food/Near-Food Producers

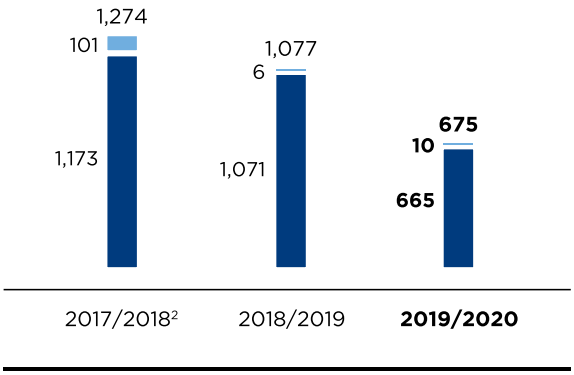
Food/Near-Food Producers in risk countries (number)



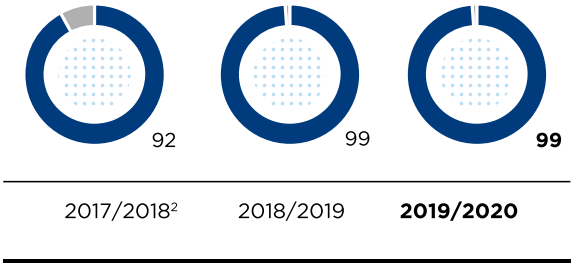
Social audits

Social audits relating to own imports by METRO SOURCING and non-food own-brand products of the METRO sales lines

Non-Food Producers[1] with valid audit (number)



Thereof with passed audit (in %)



thereof with passed audit thereof with failed audit

1 This includes producers of commercial goods (non-food own brands and own imports) who carry out the last decisive and value-giving production step.
2 Figures presented here include Real and METRO China.

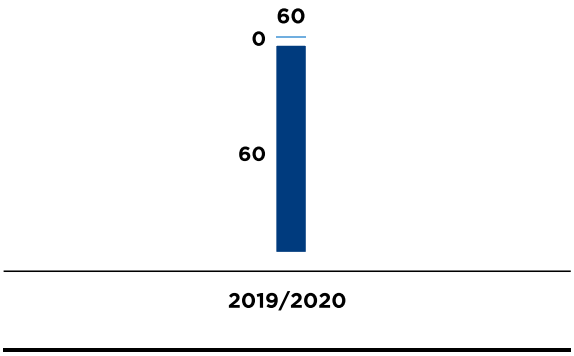
Definition: Status of all producers in countries defined as risk countries according to the assessment by the amfori Business Social Compliance Initiative (amfori BSCI) in which METRO SOURCING INTERNATIONAL has import goods manufactured, and of non-food producers who manufacture own brands or own imports for our sales lines. Producers that have passed the audit can demonstrate their successful compliance with the amfori BSCI standard or an equivalent social standard system by presenting a certificate awarded by an independent third party.

Explanation: 675 producers were audited as of 30 September 2020. Of these, 99% (665 producers) passed the audit. Effective 1 January 2019, non-food producers who fail the audit cannot be used until they achieve an acceptable audit result. In other words, they have to receive an A, B or C for the amfori BSCI assessment or an audit that is acknowledged as equivalent. In August 2020, one METRO company was granted an exemption for the (post-)corona period to continue to use individual producers with D-audit results if their D-audit result is attributable to a corona-based failure. These producers will be granted a 6-month grace period until they can demonstrate a follow-up audit result A-C.

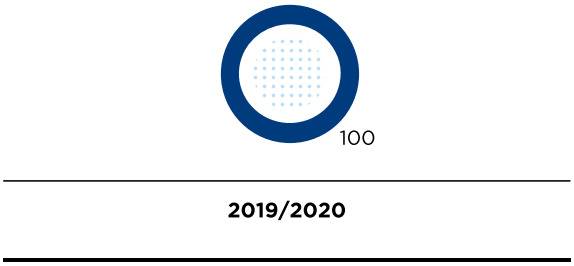
The key performance indicator relates to all the producers of which we are made aware by our suppliers.

Social audits relating to own imports by METRO SOURCING and food/near-food own-brand products of the METRO sales lines

Food/Near-Food Producers with valid audit (number)



Thereof with passed audit (in %)



thereof with passed audit thereof with failed audit

Definition: Status of all producers in countries defined as risk countries according to the assessment by the amfori Business Social Compliance Initiative (amfori BSCI) in which METRO FOOD SOURCING has import goods produced, and of Food/Near-Food producers who produce own brands or own imports for our sales lines. Producers that have passed the audit can demonstrate their successful compliance with the amfori BSCI standard or an equivalent social standard system by presenting a certificate awarded by an independent third party.

Explanation: The roll-out of the process for Food/Near-Food producers started end of 2019. 60 producers were audited as of 30 September 2020. Of these, 100% (60 producers) passed the audit. In order to allow for a gradual on-boarding of our producers into a social compliance system such as amfori BSCI or an audit scheme that is acknowledged as equivalent, all audit results are accepted and monitored closely.

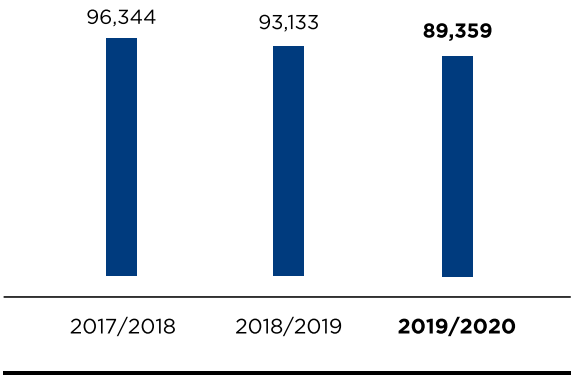
The key performance indicator relates to all the producers of which we are made aware by our suppliers.

KEY PERFORMANCE INDICATORS AND TARGETS

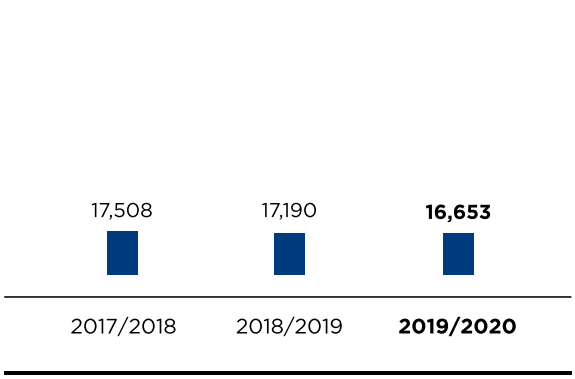
Diversity and Inclusion

Employees

METRO



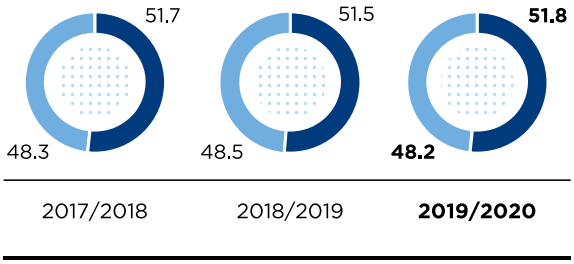
Germany



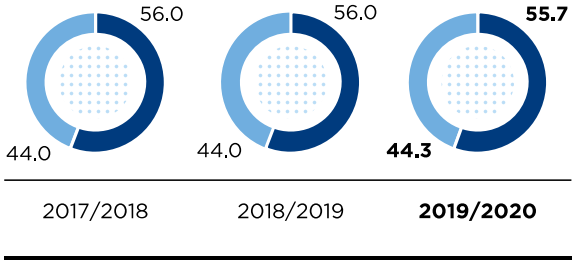
Definition: Full-time equivalent employees, average for the year, excluding trainees.

Employees by gender (in %)

METRO



Germany

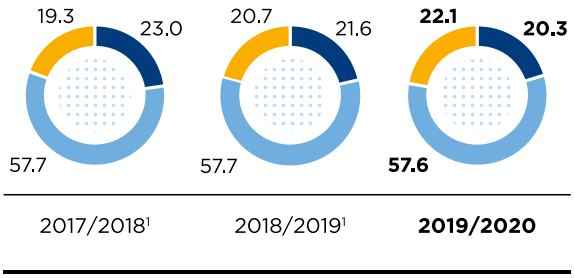


Proportion of men in % Proportion of women in %

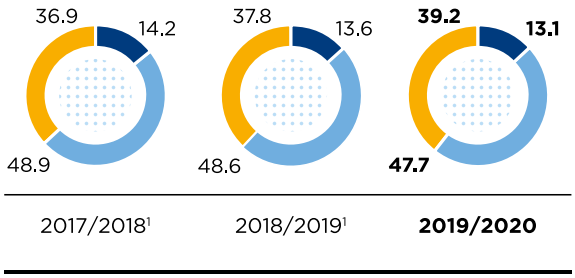
Definition: The percentage of male and female employees is calculated per capita as of 30 September.

Employees by age group (in %)

METRO



Germany



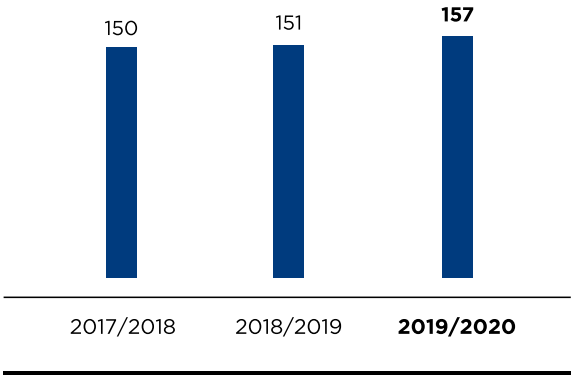
< 30 years old 30–50 years old > 50 years old

1 In the financial years 2017/18 and 2018/19 the figures were erroneously reported including trainees.

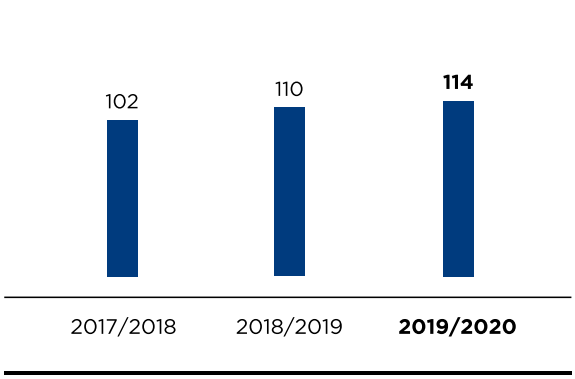
Definition: Breakdown of employees by age group, excluding trainees, as of 30 September.

Number of nationalities

METRO



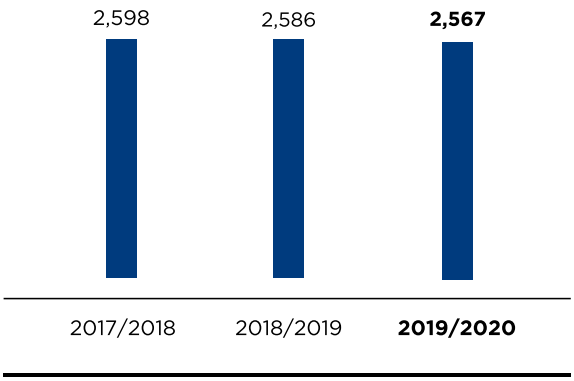
Germany



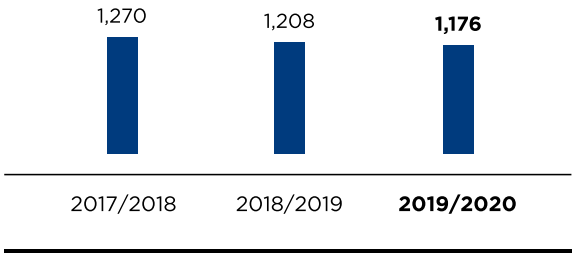
Definition: Number of different nationalities among our employees, excluding trainees, as of 30 September.

Employees with a recognised severe disability or equivalent status

METRO



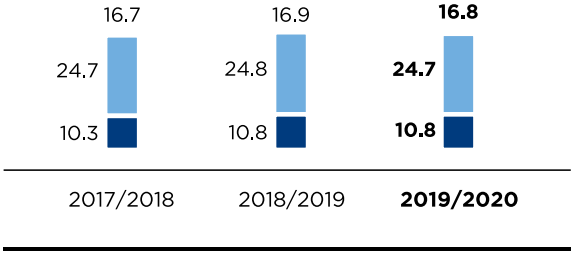
Germany



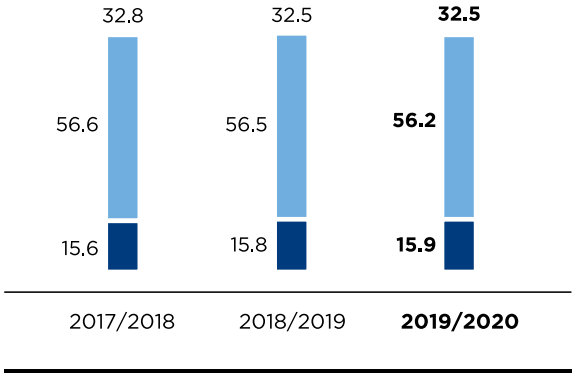
Definition: All employees considered severely disabled as defined by the respective country, or those with equivalent status.

Part-time rate by gender (in %)

METRO



Germany



Part-time rate men (% of total men)

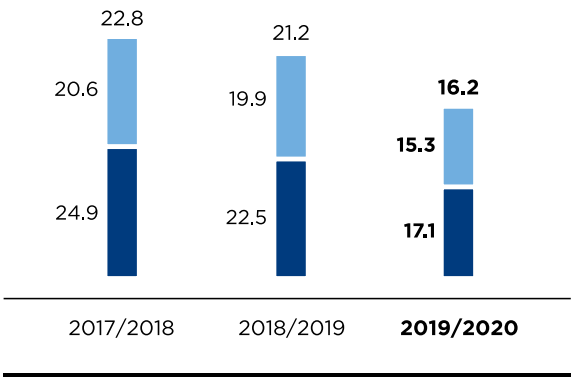
Part-time rate women (% of total women)

Part-time rate (in % of total employees)

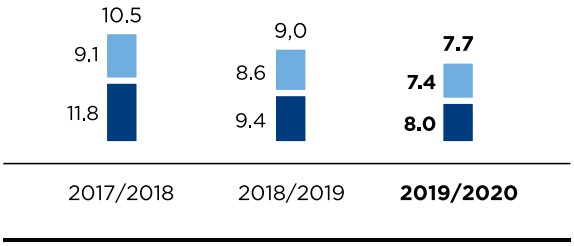
Definition: Share of part-time employees, average for the year, excluding trainees.

Employee turnover by gender (in %)

METRO



Germany

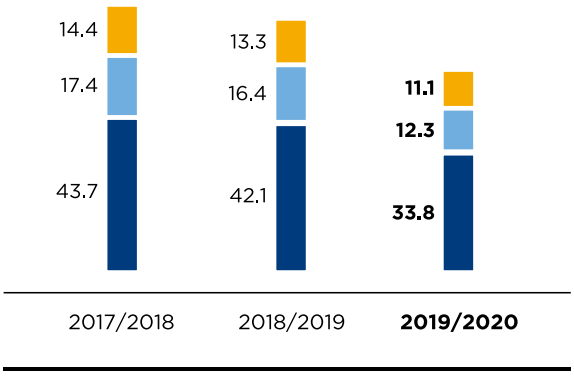


Staff turnover of men (% of total men)
Staff turnover of women (% of total women)
Staff turnover total (% of total employees)

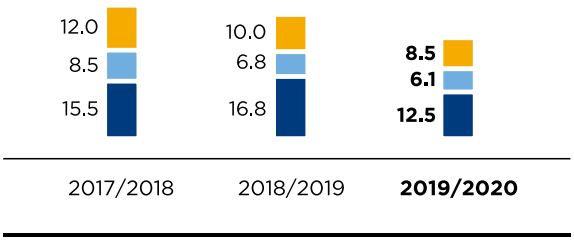
Definition: Employee turnover is defined as all employees leaving, that is those who retire, die or hand in their notice. The employee turnover rate is the number of workers leaving in relation to the average number of employees. All employees on permanent contracts are included.
Explanation: The employee turnover rate is high at METRO. This is primarily attributable to the fact that the employee turnover is generally high in several Asian and Eastern European countries where METRO operates.

Employee turnover by age (in %)

METRO



Germany

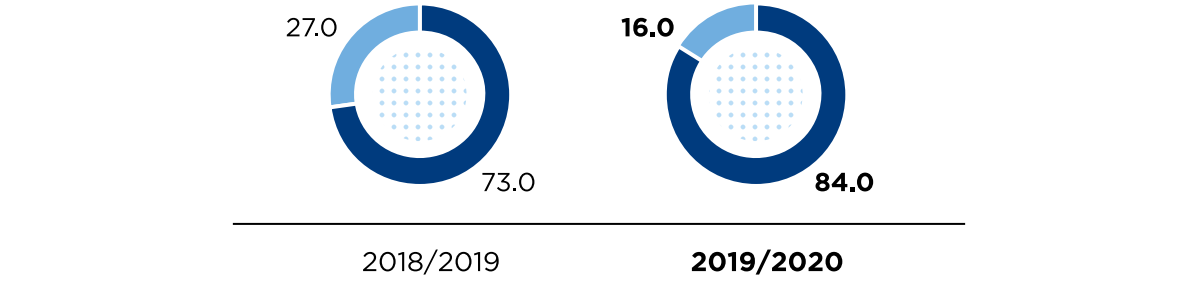


< 30 years old
30–50 years old
> 50 years old

Definition: Employees leaving due to retirement, death or resignation/dismissal, broken down by age. The employee turnover rate is the number of workers leaving in relation to the average number of employees.

Employee representation

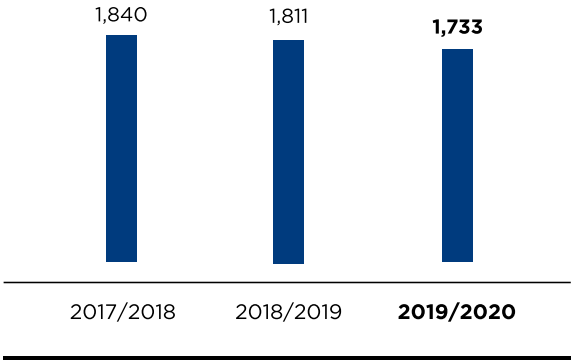
METRO



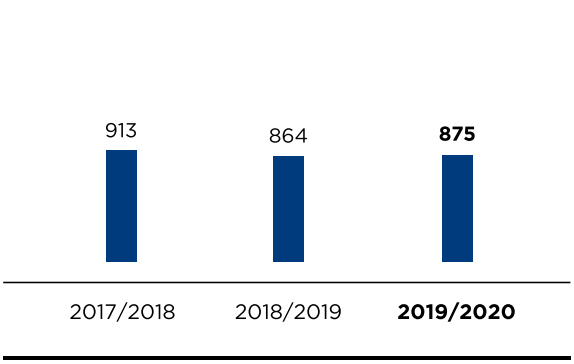
Definition: Proportion of employees who are represented by works councils, employee representatives and an independent trade union or whose interests are covered by collective agreements.

Trainees, interns and students

METRO



Germany

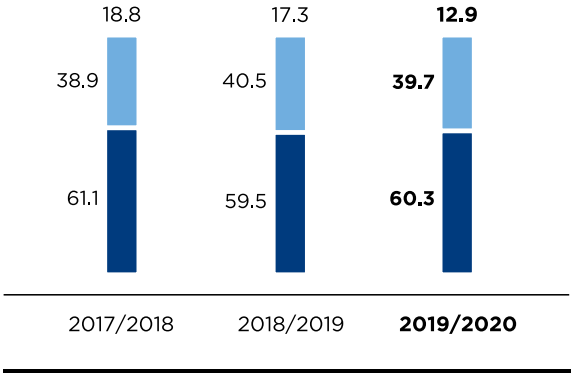


Definition: All trainees including interns and students.

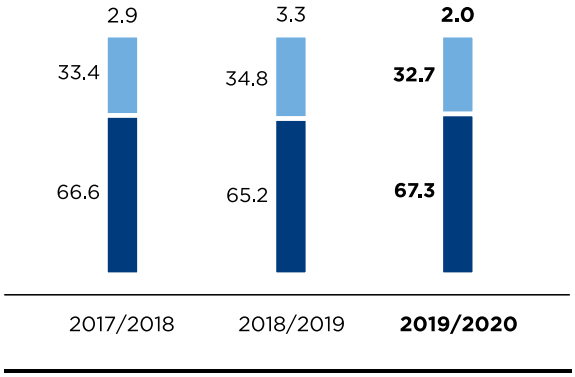
New employees

New employees by gender (in %)

METRO



Germany



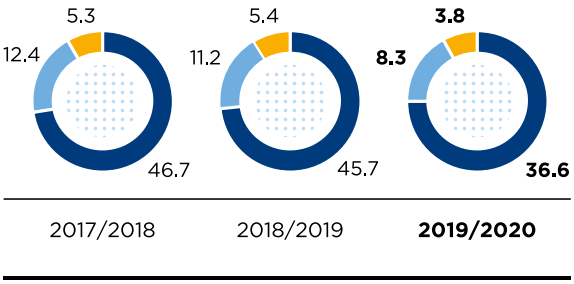
Proportion of men
Proportion of women

Proportion of new employees in relation to the average number of employees

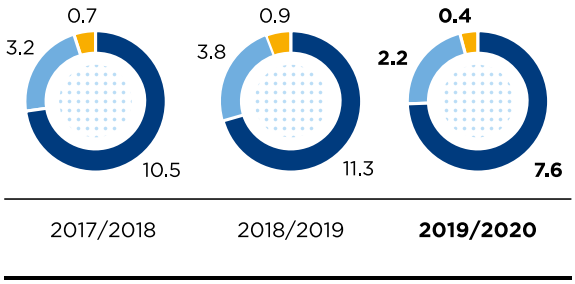
Definition: The figure for new employees includes all newly recruited employees and returning workers. The KPI shows the number of workers joining the company in relation to the average number of employees. This does not include trainees, interns, BA students and employees on temporary contracts.

New employees by age (in %)

METRO



Germany

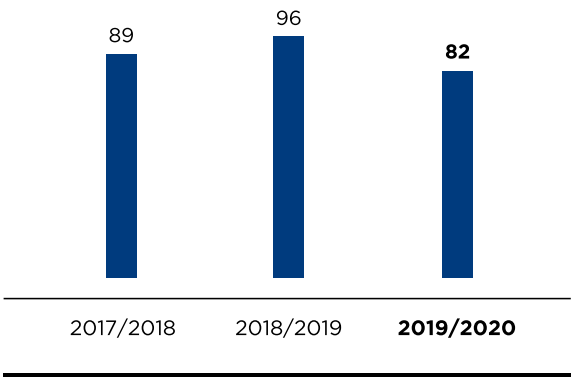


< 30 years old
30–50 years old
> 50 years old

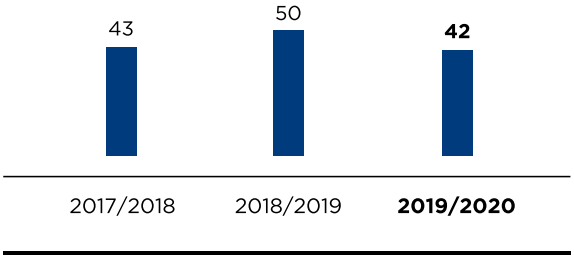
Definition: Breakdown of new employees by age group, average for the year. This does not include trainees, interns, BA students and employees on temporary contracts.

New employees number of nationalities

METRO



Germany

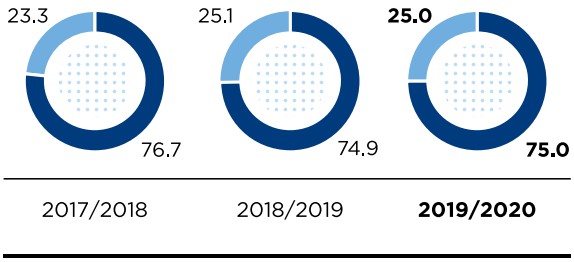


Definition: Number of different nationalities among our employees, excluding trainees, as of 30 September.

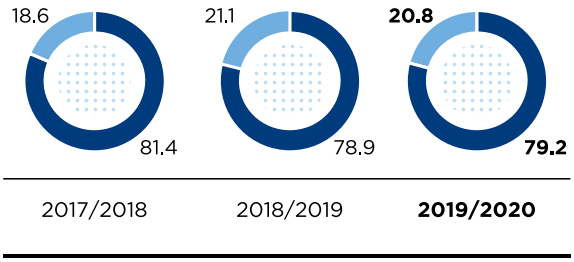
Management

Gender breakdown in managerial positions (in %)

METRO



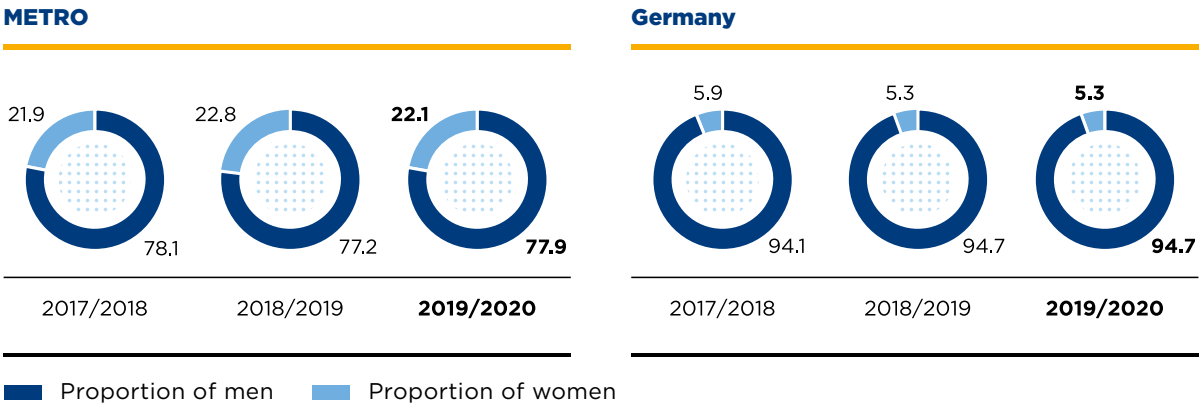
Germany



Proportion of men Proportion of women

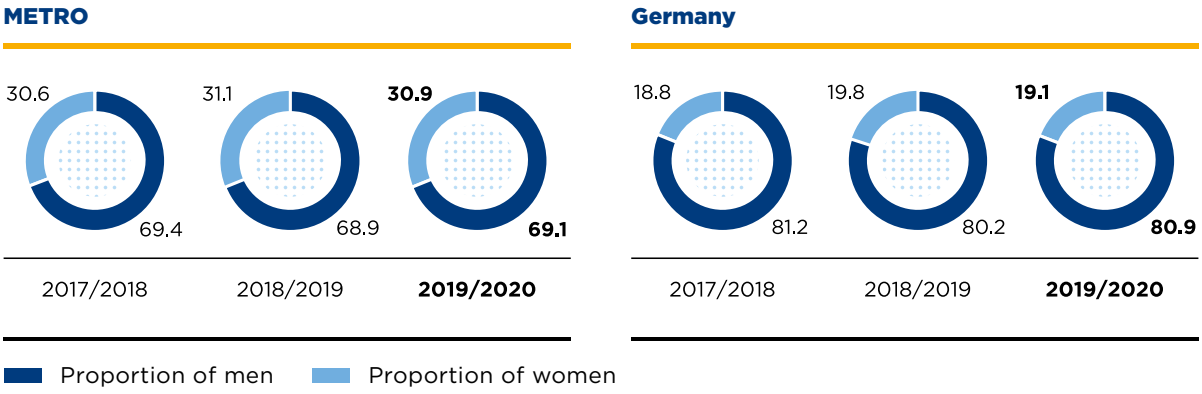
Definition: Managerial positions are those in levels 1–3 (Management Board, General Management, divisional management, departmental management and store management). The percentage of male and female employees in these positions is calculated per capita as of 30 September.
Targets: By June 2022: at least one female in Management Board, 20% women in positions one below Board and 35% women in positions two below Board.

Gender breakdown in managerial positions top management (in %)



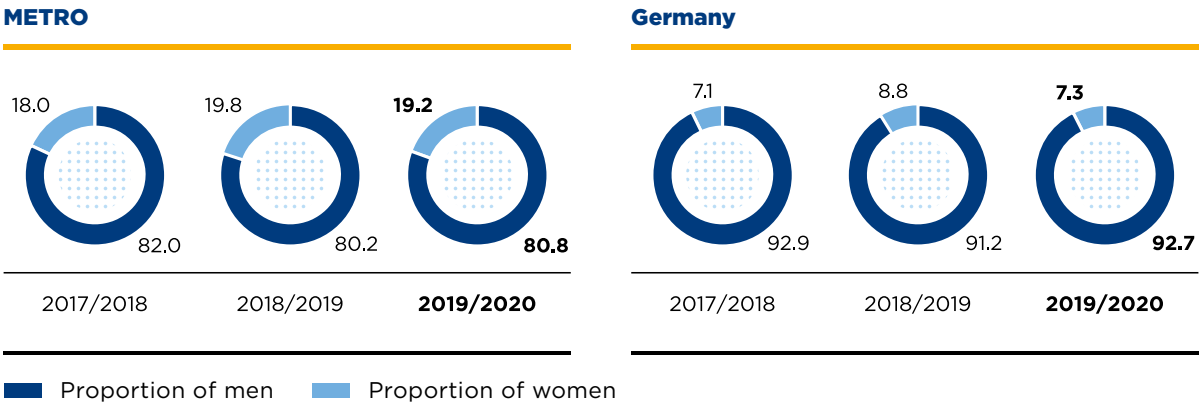
Definition: Managerial positions are those in levels 1–3 (Management Board, General Management, divisional management, departmental management and store management). The percentage of male and female employees in these positions is calculated (per capita as of 30 September).
This graph refers to women and men in top management positions i.e. maximum two levels away from the CEO or comparable positions (as a % of total top management positions).

Gender breakdown in managerial positions junior management (in %)



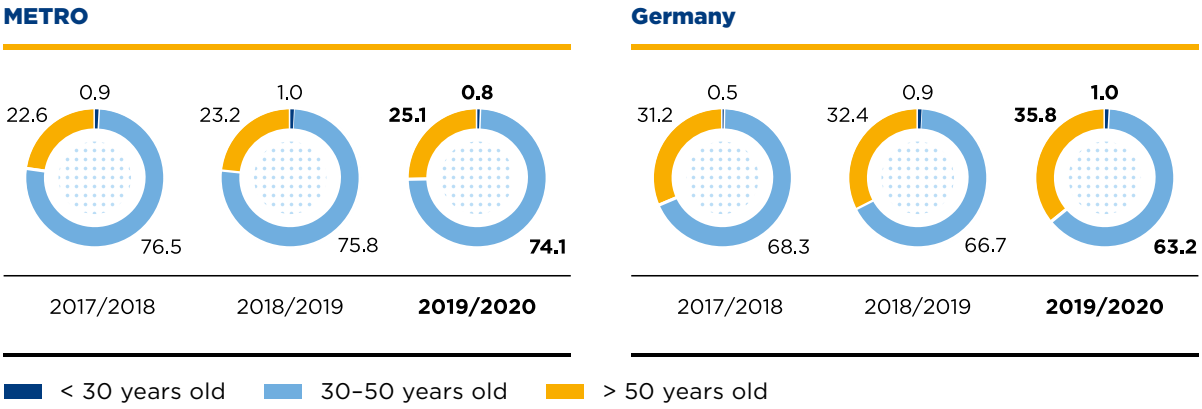
Definition: Managerial positions are those in levels 1–3 (Management Board, General Management, divisional management, departmental management and store management). The percentage of male and female employees in these positions is calculated (per capita as of 30 September).
This graph refers to women and men in junior management positions, i.e. first level of management (as % of total junior management positions).

Gender breakdown in managerial positions of revenue generating units (in %)



Definition: Managerial positions are those in levels 1–3 (Management Board, General Management, divisional management, departmental management and store management). The percentage of male and female employees in these positions is calculated (per capita as of 30 September).
This graph refers to women and men in management positions in our stores and our delivery depots or similar as a % of all managers in those units.

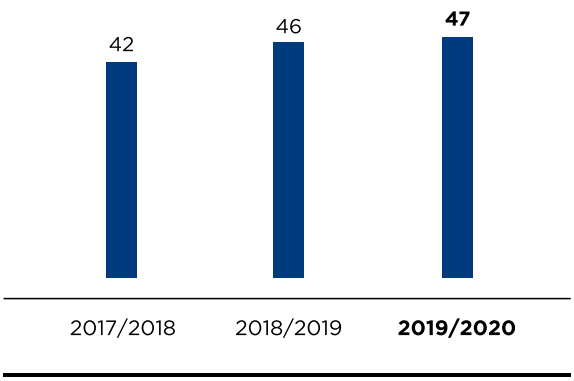
Managers by age (in %)



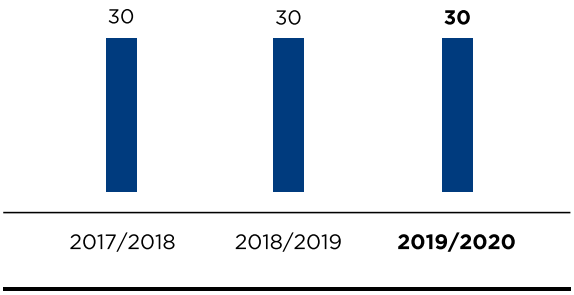
Definition: Breakdown of managers by age group as of 30 September.

Number of nationalities among managers

METRO



Germany

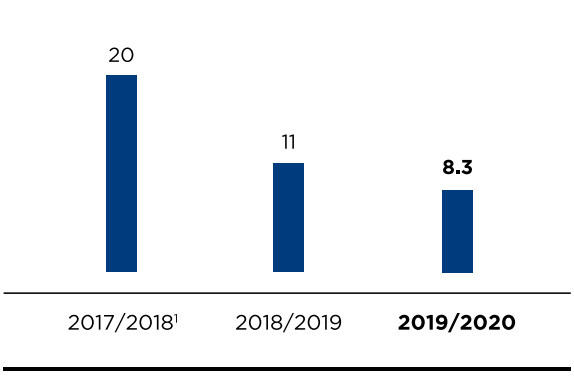


Definition: Number of different nationalities among our managers as of 30 September.

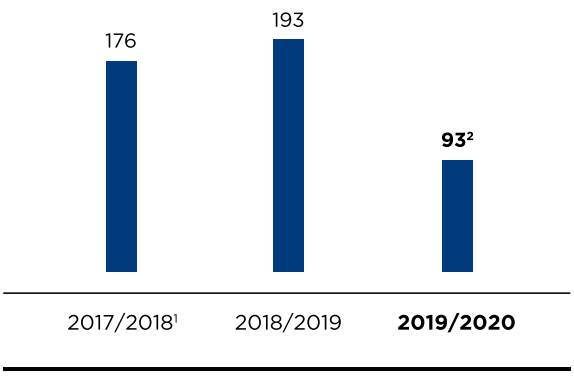
Training and Engagement

Continuing professional development

Average number of hours of CPD per employee per year



Average CPD expenditure per employee per year in €



1 Figures presented here include Real and METRO China.

2 As for training expenditure, only 16 countries have provided us figures due to Covid-19. For this reason, the figure of 93.0 EUR is calculated on a corresponding FTE, basis of the calculation are the countries that have provided such data. Greater incidence of e-Learnings during the Covid-19 drives the cost significantly down. On average, countries only used 65% of their training budget.

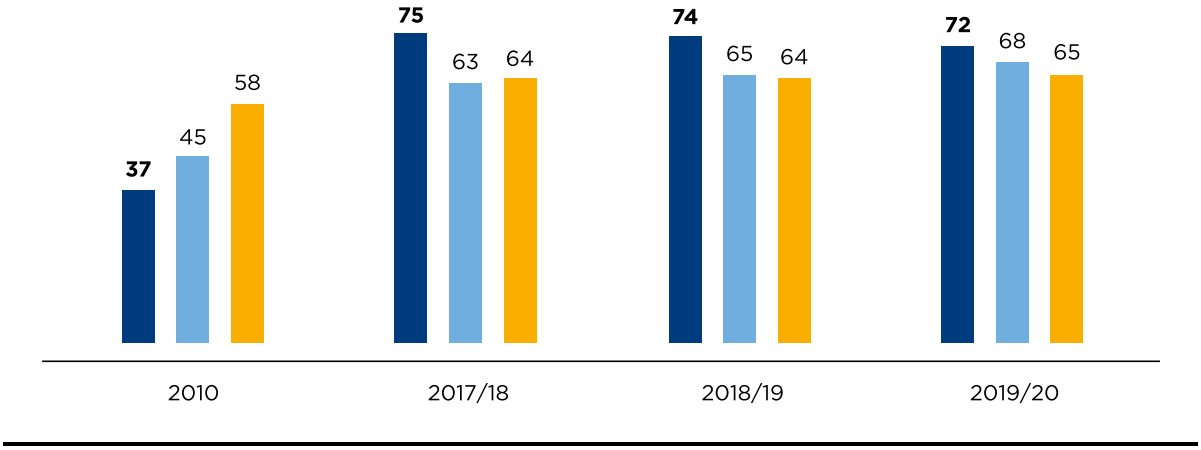
Definition: Training (hygiene, occupational safety, etc.) and courses focusing on ongoing operations plus medium- and long-term CPD opportunities that are offered with a view to enhancing the course of business.
Explanation: The figures for training relate to full-time employees on an annual average. The reporting covers 95% of all METRO employees.

The main reasons for the decrease of hours are China, which is not included for 2018/2019 anymore (would have contributed ~900,000 hours), and Russia with a decrease of ~70% in trainings delivered. These are countries where eLearnings are both inexpensive and very popular, and the overall average cost per trained employee increases.

KEY PERFORMANCE INDICATORS AND TARGETS

Employee engagement

METRO



Since the start of 2019 the engagement survey has been carried out quarterly. The 2018/19 figure is from August 2019.
The global retail benchmark was 65% this year and the global benchmark for all industries was 64%.

Community Involvement

Community Investment – METRO

in € thousand	2017/18	2018/19	**2019/20**
Charitable donations	1,107	2,002	**2,400**
Community investments	1,615	2,361	**3,735**
Commercial initiatives	2,013	1,740	**744**
Total	**4,735**	**6,103**	**6,879**

Charitable Donations
Definition: Donations for social purposes e.g. NGO, church, or other purposes as well as small donations.

Community Investments
Definition: Donations for culture, sports and science. Donations in the form of a long-term investment in the community e.g. school meals, support for the disadvantaged, food bank projects. Sponsorships that serve or promote the community in the long term e.g. METRO Marathon, Bundesverband der Tafeln e.V., World Food Programme, cultural festivals.

Commercial Initiatives
Definition: Sponsorships that are commercial and therefore do not fall under community investments.

Community Investment – Germany

in € thousand	2017/18	2018/19	**2019/20**
Charitable donations	56	142	**38**
Community investments	1,058	1,184	**1,093**
Commercial initiatives	962	628	**221**
Total	**2,076**	**1,954**	**1,352**

Charitable Donations
Definition: Donations for social purposes e.g. NGO, church, or other purposes as well as small donations.

Community Investments
Definition: Donations for culture, sports and science. Donations in the form of a long-term investment in the community e.g. school meals, support for the disadvantaged, food bank projects. Sponsorships that serve or promote the community in the long term e.g. METRO Marathon, Bundesverband der Tafeln e.V., World Food Programme, cultural festivals.

Commercial Initiatives
Definition: Sponsorships that are commercial and therefore do not fall under community investments.

COMMITMENTS, POSITIONS AND TARGETS

In the following you find METRO's sustainability related commitments, positions and targets. They offer guidance on how we formally assess and address certain sustainability issues, assuming environmental and social responsibility within business.

Food Waste

Commitment/Policy/ Position	**Target**
CGF Commitment	METRO wants to reduce food waste in our own operations by 50% per cent by 2025. We have committed to achieving this in a resolution of the Consumer Goods Forum. We are currently working on an update of the target.
WRI 10x20x30 Commitment: Champion 12.3 – 10x20x30 initiative	METRO involves 20 suppliers in the food waste reduction approach partnering with World Resource Institute by 2030.

Conscious Proteins

Commitment/Policy/ Position	**Target**
Position on Conscious proteins	METRO's approach to Conscious Proteins has three streams: Sustainable sourcing: Conscious proteins must be sourced responsibly which includes following established practices determined by our existing policies and commitments on sustainable sourcing Marketing and creating customer awareness: we will promote conscious proteins in a responsible way Eating (our customers' plate and menu): we will help our customers understand what they can do to create plates with conscious proteins in the context of their locality and culture.

Organic and Responsible Products

Commitment/Policy/ Position

METRO Health and Nutrition Policy with regards to own brand products

Target

Less of sugar and salt:

- METRO-wide reduction of min. 5% sugar/salt content in at least 60 common sourced products and 1000 locally products by December 2021

Free from:

- Trans fat: Not above 2g of trans fat per 100g of fat, other than transfat naturally occurring by April 2021
- Flavour enhancer: Avoid monosodium glutamate (MSG, E621) on selected OB products by December 2021
- Azo food colours: Replace Tartrazine E102, Quinoline yellow E104, Sunset yellow E110, Carmoisine E122, Ponceau 4R E124 and Allura red E129 in OB common sourced products and preferably in all OB products and especially OB mainstream products by December 2021
- Preservatives: Find opportunities to lower the content or avoid Potassium Nitrite E249, Sodium Nitrite E250, Sodium Nitrate E251 and Potassium nitrate E252 in OB mainstream products by December 2021
- Other additives (Preservatives, Nanoparticles, Caramel, Modified starch, others): Reducing number of additives following the Benchmark testing results and making efforts toward the “Clean Label” products whenever and as much as possible by December 2021

See all KPIs of Organic and Responsible Products ▸ page 31

Raw Material Sourcing

Commitment/Policy/ Position	Target
Approach for sourcing of agricultural raw materials with regards to own brand products	./.
Policy for Sustainable Sourcing with regards to own brand products	./.
Soy Procurement Policy with regards to own brand products	Soy as an ingredient (Tier 1 soy) in product with over 95% soy ingredient. e.g.: edamame beans, miso soup, miso paste, soybean oil, soy nuts, soy sauce, tofu, and Soy in animal feed (Tier 2 soy) must be certified by end 2025 with certification scheme by: 1. Round Table for Responsible Soy (RTRS Credits or RTRS Certified) or 2. ProTerra certification scheme or 3. Any of the FEFAC approved certification schemes
Palm oil Procurement Policy with regards to own brand products	Target: 100% sustainable palm oil on RSPO level Segregated or Identity Preserved until 2023 in METRO's own brand products

Paper and Wood Procurement Policy with regards to own brand products	Environmental:
	– 100% of own-brand products made from wood or wood fibre in accordance with the scope originate from legal and responsibly managed forests by 2020
	– For those countries, where the market is still challenging to meet the above mentioned target year a prolongation to 2023 applies
	
	For assessing compliance the following shall apply:
	– Products made from recycled wood or fibre are considered to be sustainable for the purpose of this policy; on top they can be certified according to ISO 14024:2018 type I label
	– Products made from virgin fibre must be certified in accordance to one of the third-party forest certification schemes
	  – FSC (Forest Stewardship Council) or
	  – PEFC (Programme for the Endorsement of Forest Certification Schemes)

	Social: By 2020 METRO aims within our Own Brand (Private Label) supply chain for 100% of paper and wood products: – All processing factories have to be audited or certified against one of the accepted social audits or certification following the requirements of the METRO Policy for Social Compliance.
Meat Procurement Policy with regards to own brand products	The meat policy does not contain any new targets but builds upon relevant targets from policies related to sustainable sourcing.
Animal Welfare Policy with regards to own brand products	METRO aims to improve its assortment towards higher animal health and welfare standards by achieving the following targets: 100% Transparency of livestock origin (country of farm & slaughtering) 100% Exclusion of preventive usage of antibiotics and growth promotors 100% Exclusion of cloned animals or genetically modified animals 100% Exclusion of routine mutilation practice such as, castration, tail docking, teeth clipping, tooth clipping beak trimming, fin clipping 100% Exclusion of cage eggs from supply chain in accordance to Cage Free Egg Procurement Policy 100% humanely stunning of animals prior to slaughtering Avoidance of long distance traveling wherever possible and ensure animal live transportation to a minimum
Fish and Seafood Procurement Policy with regards to own brand products	METRO has set itself three fish and seafood targets: Environmental: 90% of our top twelve species will by 2025 either: 1. Be certified according to one of the accepted certification standards or 2. Be engaged in a credible comprehensive Fishery Improvement Project (FIP) or in an Aquaculture Improvement Project (AIP) that is in progress towards certification and with the clear target to achieve certification within a reasonable timeframe or 3. Be engaged with a third-party audit or a local certification scheme with reliable criteria.

	Social: By 2025 METRO aims for 100 % of species to be audited or certified against one of the accepted social audits/ certifications following the requirements of the METRO Policy for Social Compliance. Currently this is valid only for land-based processing factories as well as land-based and at-sea aquaculture. Regarding at-sea operations METRO will accept any certification standard that has been recognized by a fish- and seafood-specific social benchmark tool, which will be developed. Traceability: By 2030 all products have to be digitally traceable and have to meet key data elements of the Global Dialogue on Seafood Traceability (GDST) standard. Additionally, the scientific and common names of species as well as the FAO catching area (wild catch) or name of the body of water (inland fishing) or the country of aquaculture have to be visible on products.
Commitment on cage free eggs sourcing with regards to own brand products	METRO is committed to sourcing 100% cage free shell eggs and to implement a 100% cage free liquid egg product assortment: – by the end of 2022 in West and South Europe DE|AT|IT|PT|ES|BE|NL|FR – by the end of 2025 in East Europe (HU|HR|RS|PL|CZ/ SK|RO|TR|BG) plus UA and RU – by the end of 2027 in remaining markets, such as IN|CN|PK|JP, in which the sourcing of cage-free eggs is currently challenging, so we are working together with the industry to solve the issue.
Position on Genetically Modified Organisms (GMOs)	./.
Position on Biodiversity	./.
Principles of good practice supply chain food (European Supply Chain Initiative)	./.

Human Rights

Commitment/Policy/ Position	Target
Policy for Social Compliance with regards to own brand products	Target: Socially compliant supply chains for all risky own brand producers by 2030. This includes non-food, near-food and food producers of all tiers that bear a risk in their production facilities with regards to potential Human Rights violations. The social compliance can be proven by a valid audit against one of METROs accepted social audit schemes.

See all KPIs of Human Rights ▸ page 37

Packaging and Plastic

Commitment/Policy/ Position	Target
METRO Packaging Policy with regards to own brand products	Target: 100% Polyvinyl Chloride (PVC)/Polyvinylidene chloride (PVdC) phase out in own brand products packaging on all packaging levels (primary, secondary and tertiary) by 2023, baseline 2014 Target: 100% Expanded polystyrene (EPS) phase out in own brand products packaging on all packaging levels (primary, secondary and tertiary) by 2023, baseline 2018 Target: 100% Forest Stewardship Council® (FSC®)/Programme for the Endorsement of Forest Certification Schemes (PEFC) certification for all paper, paperboard, cardboard and wood own brand products packaging on primary and secondary packaging level by 2023, baseline 2018 Target: 300 t plastic reduction in own brand products conventional plastic packaging by 2023, compared to baseline 1 October 2018
Single Use Plastic Policy with regards to own brand products	By 2025, we will empower our customers' businesses to move into a future without conventional single use plastic and increase resource efficiency by: – Providing reusable, recyclable and compostable alternatives – Supporting our customers in this phase out and – Advocating for the movement towards a circular economy regarding plastic
Ellen MacArthur New Plastics Economy Global Commitment	Disclosure of data in the Ellen MacArthur Global Commitment progress report

Climate Action

Commitment/Policy/ Position	Target
Environmental guideline	./.
Science based Climate protection target	Reduction of scope 1 and scope 2 CO_2 emissions by 60% per square metre selling and delivery space by 2030 compared to 2011. And reduction of absolute scope 3 CO_2 emissions (supply chain) by 15% by 2030 compared to 2018.
EV100 initiative commitment	Expansion of charging infrastructure, including the parking lots of local METRO stores to 1,000 charging points till 2030. Promotion of electric mobility in METRO's own fleet of vehicles to reach nearly 100% availability of electrical or high-quality hybrid vehicles by 2030.

See all KPIs of Climate Action ▸ page 32

Diversity and Inclusion

Commitment/Policy/ Position	Target
Commitment for equal opportunities at work for men and women	25% of employees on the 1st management level below the Management Board and 40% of employees on the 2nd management level below the Management Board of METRO AG to be women by September 2025. By September 2025, 30% of managerial positions on levels 1–3 (including store managers) of METRO Wholesale locations worldwide to be filled by women.

See all KPIs of Diversity and Inclusion. ▸page 41

GRI AND UN GLOBAL COMPACT

GRI STANDARDS CONTENT INDEX

Universal standards

Organizational profile

GRI indicator		Link/Comment
102-1	Name of the organization	CRR: Imprint ▶ page 109
102-2	Activities, brands, products, and services	CRR: Business model ▶ page 5 AR: Group business model
102-3	Location of headquarters	CRR: Imprint ▶ page 109
102-4	Location of operations	CRR: Business model ▶ page 5 AR: Group business model AR: Affiliated companies AR: Store network by country and segments
102-5	Ownership and legal form	CRR: Imprint ▶ page 109 AR: Shareholder structure of METRO AG AR: Combined non-financial statement of METRO AG
102-6	Markets served	CRR: Business model ▶ page 5 AR: Group business model
102-7	Scale of the organization	CRR: Key Performance Indicators – Diversity and Inclusion – Employees ▶ page 41 CRR: Key Performance Indicators – Company ▶ page 30 AR: Group business model AR: Asset, financial and earnings position AR: Capital structure Additional information: METRO sells products from renowned manufacturers as well as own brands that combine high quality with an attractive price. In Germany, for example, the entire assortment comprises around 186,000 at METRO Wholesale.
102-8	Information on employees and other workers	CRR: Key Performance Indicators – Diversity and Inclusion – Employees ▶ page 41 CRR: Key Performance Indicators – Diversity and Inclusion – Part-time rate ▶ page 41 Additional information: Due to different legal regulations in the individual countries in which METRO operates, it is not meaningful to indicate the proportion of fixed-term employment contracts. Since the proportion of persons who are not employees or employees bound by instructions (including employees and employees of contractual partners bound by instructions) is immaterial, it is not reported.

GRI indicator		Link/Comment
102-9	Supply chain	CRR: Business model ▶ page 5 CRR: Sustainability strategy ▶ page 12 Additional information: As a retail and wholesale company, our supply chain can be simplified as follows: Manufacturers, producers and producers of food and non-food products; transport, storage and distribution; stores; consumers. Our supply chain management approaches can be found in the sections related to our sustainability key focus areas.
102-10	Significant changes to the organization and its supply chain	AR: Sales and earnings development of the segments AR: Discontinued operations AR: Letter to the shareholders Additional information: In our purchasing processes we make sure that we are not dependent on our suppliers. Our supplier structure has not changed significantly in this respect. Accordingly, we do not report changes in supplier location, supply chain structure or supplier relationships (including selection and termination). METRO's internal structures have also largely remained the same. The chapter Review of the Annual Report provides information on the changes.
102-11	Precautionary Principle or approach	CRR: METRO SUSTAINABLE – our ambition ▶ page 9 CRR: Sustainability strategy ▶ page 12 CRR: Our focus areas ▶ page 26 CRR: Commitments, positions and targets ▶ page 53
102-12	External initiatives	CRR: Commitments, positions and targets ▶ page 53
102-13	Membership in associations and interest groups	Additional information: (PDF:) Memberships in selected organisations

Strategy

GRI indicator		Link/Comment
102-14	Statement from senior decision-maker	CRR: Letter from the Management Board ▶ page 3 CRR: Global challenges ▶ page 6 CRR: METRO SUSTAINABLE – our ambition ▶ page 9 CRR: Sustainability strategy ▶ page 12 CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas ▶ page 26 AR: Letter to the shareholders AR: Goals and strategy AR: Macroeconomic and industry-specific conditions AR: Report on events after the closing date and outlook AR: Opportunities and risk report
102-15	Key impacts, risks, and opportunities	AR: Combined non-financial statement of METRO AG – Environmental matters AR: Combined non-financial statement of METRO AG – Social matters AR: Opportunities and risk report

Ethics and integrity

GRI indicator		Link/Comment
102-16	Values, principles, standards, and norms of behavior	CRR: METRO SUSTAINABLE – our ambition ▶ page 9 CRR: Our focus areas ▶ page 26 CRR: Commitments, positions and targets ▶ page 53 AR: Combined non-financial statement of METRO AG – Employee interests – Sustainable human resources (HR) strategy AR: Combined non-financial statement of METRO AG – Combating corruption and bribery AR: Corporate Governance
102-17	Mechanisms for advice and concerns about ethics	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Corporate Governance Additional information: Report abuses

Governance

GRI indicator		Link/Comment
102-18	Governance structure	CRR: Sustainability management ▶ page 10 AR: The Management Board AR: Advice and supervision in consultation with the Management Board AR: Work in the committees AR: The Management Board AR: Report of the Supervisory Board AR: Combined non-financial statement of METRO AG
102-19	Delegating authority	CRR: Sustainability management ▶ page 10
102-20	Executive-level responsibility for economic, environmental, and social topics	CRR: Sustainability management ▶ page 10 AR: The Management Board
102-21	Consulting stakeholders on economic, environmental, and social topics	CRR: Materiality analysis 2019/20 ▶ page 13 Additional information: Stakeholder relations
102-22	Composition of the highest governance body and its committees	AR: Corporate Governance Additional information: Corporate Governance
102-23	Chair of the highest governance body	AR: Report of the Supervisory Board
102-24	Nominating and selecting the highest governance body	AR: Corporate Governance Additional information: Corporate Governance
102-25	Conflicts of interest	AR: Report of the Supervisory Board
102-26	Role of highest governance body in setting purpose, values, and strategy	AR: Corporate Governance Additional information: Corporate Governance
102-27	Collective knowledge of highest governance body	AR: Corporate Governance

GRI indicator		Link/Comment
		Additional information: Corporate Governance
102-28	Evaluating the highest governance body's performance	CRR: Sustainability management ▶ page 10 Additional information: The remuneration of the Management Board and the global senior management is partly linked to the valuation of METRO's sustainability performance in the rating of the Dow Jones Sustainability Index (DJSI). This reflects the performance of governance regarding sustainability related topics.
102-29	Identifying and managing economic, environmental, and social impacts	CRR: Materiality analysis 2019/20 ▶ page 13 CRR: METRO SUSTAINABLE – our ambition ▶ page 9 CRR: Management approach ▶ page 24 CRR: Our focus areas ▶ page 26
102-30	Effectiveness of risk management processes	AR: Opportunities and risk report
102-31	Review of economic, environmental, and social topics	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Opportunities and risk report
102-33	Communicating critical concerns	AR: Compliance and risk management
102-34	Nature and total number of critical concerns	AR: Advice and supervision in consultation with the Management Board
102-35	Remuneration policies	AR: Remuneration report
102-36	Process for determining remuneration	AR: Remuneration report
102-37	Stakeholders' involvement in remuneration	AR: Remuneration report

Stakeholder engagement

GRI indicator		Link/Comment
102-40	List of stakeholder groups	Additional information: Stakeholder relations
102-41	Collective bargaining agreements	CRR: Key Performance Indicators – Diversity and Inclusion – Employee representation ▶ page 41
102-42	Identifying and selecting stakeholders	CRR: METRO SUSTAINABLE – our ambition ▶ page 9 Additional information: Stakeholder relations Additional information: The exchange takes place with stakeholders along the entire value chain and takes into account both our impact and the potential impact on us.
102-43	Approach to stakeholder engagement	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Customer satisfaction and innovation management Stakeholder relations
102-44	Key topics and concerns raised	CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas ▶ page 26 AR: Customer satisfaction and innovation management

Reporting practice

GRI indicator		Link/Comment
102-45	Entities included in the consolidated financial statements	CRR: Business model ▶ page 5 AR: Consolidated group AR: Affiliated companies Additional information: The METRO Corporate Responsibility Report 2019/20 covers the main operating units, including the sales lines and service companies as well as the holding. In addition, the respective scope is noted in the indicators.
102-46	Defining report content and topic Boundaries	CRR: Materiality analysis 2019/20 ▶ page 13
102-47	List of material topics	CRR: Materiality analysis 2019/20 ▶ page 13
102-48	Restatements of information	CRR: Key performance indicators and targets ▶ page 28 Additional information: Any new representations of information in comparison with previous reports are explained by footnotes at the appropriate points, where available.
102-49	Changes in reporting	CRR: Key performance indicators and targets ▶ page 28 AR: Accounting processes for consolidation purposes Additional information: Important changes to the scope of the report and the limitations of aspects, if any, are explained in the appropriate places.
102-50	Reporting period	CRR: About this report ▶ page 104
102-51	Date of most recent report	CRR: About this report ▶ page 104
102-52	Reporting cycle	CRR: About this report ▶ page 104
102-53	Contact point for questions regarding the report	CRR: Imprint ▶ page 109
102-54	Claims of reporting in accordance with the GRI Standards	CRR: About this report ▶ page 104
102-55	GRI content index	CRR: GRI Content index ▶ page 60
102-56	External assurance	CRR: About this report ▶ page 104 CRR: Assurance about this report ▶ page 106

Topic specific standards

Economic

Economic Performance

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 CRR: METRO SUSTAINABLE – our ambition ▶ page 9 CRR: Management approach ▶ page 24 AR: Combined non-financial statement of METRO AG – METRO SUSTAINABLE AR: Combined non-financial statement of METRO AG – Actively managing sustainability
103-2	The management approach and its components	CRR: Management approach ▶ page 24 CRR: My sustainable Restaurant ▶ page 27 AR: Combined non-financial statement of METRO AG – METRO SUSTAINABLE AR: Combined non-financial statement of METRO AG – Actively managing sustainability AR: Goals and strategy
103-3	Evaluation of the management approach	CRR: Management approach ▶ page 24 CRR: My sustainable Restaurant ▶ page 27 AR: Combined non-financial statement of METRO AG – METRO SUSTAINABLE AR: Combined non-financial statement of METRO AG – Actively managing sustainability AR: Goals and strategy
GRI 201: Economic Performance 2016		
201-1	Direct economic value generated and distributed	CRR: Key Performance Indicators – Community Investment ▶ page 52 AR: Cash flow statement AR: Financial liabilities AR: Other taxes Reason for omission: For reasons of competition law, we do not report the value generated and distributed in detail separately at national, regional or store level.
201-2	Financial implications and other risks and opportunities due to climate change	AR: Description of the opportunity and risk situation
201-3	Defined benefit plan obligations and other retirement plans	AR: Balance sheet AR: Provisions for post-employment benefits plans and similar obligations Additional information: Due to the different pension schemes, it is not possible to separate contributions from employers and employees.

Market Presence

GRI indicator		Link/Comment
GRI 202: Market Presence 2016		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	Additional information: From May to July 2020, a survey on fair working conditions and social partnerships was conducted with all METRO companies. Afterwards, limited audit procedures were conducted at 5 selected METRO companies. The aim was to assess the current status of implementation of the principles of fair working conditions and social partnership (FWC&SP) in key METRO units and to make recommendations for improving the FWC&SP process. This survey shows that in more than 90% of METRO entities the wages which are paid comply or exceed with the local legal minimum. We do not currently record the ratio of standard entry level wages by gender.
202-2	Proportion of senior management hired from the local community	Additional information: Almost 60% of our board members in the METRO Wholesale countries are hired from the respective country of operation. Our target corridor lies between 60% to 75% locally hired board members.

Procurement Practices

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Organic and Responsible Products ▶ page 26 CRR: Our focus areas – Raw Material Sourcing ▶ page 26 CRR: Our focus areas – Conscious Proteins ▶ page 26
103-2	The management approach and its components	CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Organic and Responsible Products ▶ page 26 CRR: Our focus areas – Raw Material Sourcing ▶ page 26 CRR: Our focus areas – Conscious Proteins ▶ page 26

GRI indicator		Link/Comment
103-3	Evaluation of the management approach	Additional information: Local suppliers are no material topic in itself but are associated with the following material topic – mainly "organic and responsible products" but also "raw material sourcing" and "conscious proteins". Therefore please read more in the following links. CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Organic and Responsible Products ▶ page 26 CRR: Our focus areas – Raw Material Sourcing ▶ page 26 CRR: Our focus areas – Conscious Proteins ▶ page 26
GRI 204: Procurement Practices 2016		
204-1	Proportion of spending on local suppliers	CRR: Our focus areas – Organic and Responsible Products ▶ page 26 Reasons for omission: We do not report this indicator as the targeted data quality is not reached yet, we work on improving the corresponding data collection. Our definition for "regional/local suppliers/products" is as follows: A product is defined as "regional/local" if the METRO/makro country has its country specification on the criteria of "proximity" AND fulfills two further criteria of the ones stated below. 1. Proximity (main and/or value giving production OR ingredient 100% from a defined region OR x km around store) AND 2. Additionally two criteria out of: a. Transparency and traceability of product b. Producer is a small holder producer c. Producer supports local/regional infrastructure and economy d. Product is produced in traditional way or based on traditional recipe e. Product is a re-discovery of old varieties f. Product must create association to region for customer Also geographically indicated products must be analysed on the basis of this definition, as they are not necessarily regional.

Anti-corruption

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery CRR: Materiality analysis 2019/20 ▶ page 13 CRR: UN GC – Anti-corruption measures ▶ page 102 Additional information: Corporate Governance
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery CRR: UN GC – Anti-corruption measures ▶ page 102 Additional information: Corporate Governance
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery CRR: UN GC – Anti-corruption measures ▶ page 102 Additional information: Corporate Governance
GRI 205: Anti-corruption 2016		
205-1	Operations assessed for risks related to corruption	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery CRR: UN GC – Anti-corruption measures ▶ page 102 Additional information: Corporate Governance Additional information: All operating companies and service companies of METRO (except companies with minority shareholdings) are reviewed for compliance risks such as corruption. Continuously, METRO holds workshops in order to assess compliance risks. Within the framework of the workshops, several compliance risks including corruption are checked for their damage potential and their probability of occurrence in the respective company. Various risk scenarios were developed for the workshop, for example on active or passive corruption towards different stakeholders such as suppliers or civil servants. The results of the risk assessments in the companies are reviewed and consolidated at Group level as part of corporate risk management. METRO's business activities are subject to a large number of legal norms and voluntary commitments. The legal requirements have become more comprehensive and complex, so have the expectations customers and the public have of the company's compliance. In order to meet these requirements, METRO has introduced and continuously expanded a Group-wide compliance management system. The aim of this system is to systematically and permanently prevent violations of the law within the company as well as to detect and sanction them to prevent them from happening again in the future. One focus of our compliance management system lies on the prevention of corruption. Corruption risks can arise when dealing with authorities and civil servants and can also occur in business relationships with suppliers and other business partners. On the basis of the risks identified, the necessary organizational structures are set up as part of the compliance management system. In order to manage compliance risks, METRO AG has issued

GRI indicator		Link/Comment
		Group-wide guidelines, such as an anti-corruption guideline or a guideline on dealing with external advisors. These guidelines lay down rules for dealing with authorities and civil servants on the one hand and business partners on the other. The anti-corruption guideline also provides guidance on a due diligence of business partners before entering into and during a business relationship.
205-2	Communication and training about anti-corruption policies and procedures	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery AR: Compliance and risk management CRR: UN GC – Anti-corruption measures ▶ page 102 Additional information: METRO has established procedures for compliance training that apply to all operating companies and service companies (except for companies with minority shareholdings) and promote compliance and the prevention of corruption. The training processes apply throughout the Group and affect employees as well as members of the management bodies. The target groups of the anti-corruption trainings and procedures are defined according to their significance in terms of content and organization and follows a risk-based approach, which is based, among other things, on the risk profile of the function or position in the company. Executives are as much a part of this approach as employees. In fiscal year 2019/20, new employees were informed about anti-corruption guidelines and procedures. In addition, anti-corruption guidelines are provided via internal communication channels such as the intranet or the social network. Relevant business partners must go through a Compliance Due Diligence (CDDS) before concluding a contract with METRO for the first time. A new check is carried out at regular intervals. Reason for omission: For technical reasons, the presentation of data required by GRI is currently not possible.

Anti-competitive Behavior

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery CRR: Materiality analysis 2019/20 ▶ page 13 CRR: UN GC – Anti-corruption measures ▶ page 102 Additional information: Corporate Governance
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery CRR: UN GC – Anti-corruption measures ▶ page 102 Additional information: Corporate Governance
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Combating corruption and bribery CRR: UN GC – Anti-corruption measures ▶ page 102 Additional information: Corporate Governance
GRI 206: Anti-competitive Behavior 2016		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	AR: Remaining legal issues Additional information: Information on legal disputes, investigations and other legal issues as well as on the associated potential risks and effects for METRO can be found in section 49 “Remaining legal issues” in the notes to the consolidated financial statements of METRO AG as of 30 September 2020. Only legal matters of material importance for the net assets, financial position and results of operations of the Group or METRO AG are reported. The principle of materiality of management reporting is derived from § 315 HGB in conjunction with DRS 20 for the consolidated financial statements of METRO AG and from § 289 HGB in conjunction with DRS 20 for the individual financial statements of METRO AG.

Environmental

Materials

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Packaging and Plastic ▶ page 26 CRR: Commitments, positions and targets – Packaging and Plastic ▶ page 58 CRR: UN GC – Environmental protection ▶ page 99
103-2	The management approach and its components	CRR: Management approach ▶ page 24 CRR: Our focus areas – Packaging and Plastic ▶ page 26 CRR: Commitments, positions and targets – Packaging and Plastic ▶ page 58 CRR: UN GC – Environmental protection ▶ page 99
103-3	Evaluation of the management approach	CRR: Management approach ▶ page 24 CRR: Our focus areas – Packaging and Plastic ▶ page 26 CRR: Commitments, positions and targets – Packaging and Plastic ▶ page 58 CRR: UN GC – Environmental protection ▶ page 99
GRI 301: Materials 2016		
301-2	Recycled input materials used	CRR: Key Performance Indicators – Climate Action – Amount of waste and recycling rate ▶ page 36 Additional information: Key Performance Indicators – Packaging and Plastic

Energy

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Environmental matters CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Climate Action ▶ page 26 CRR: Commitments, positions and targets – Climate Action ▶ page 59 CRR: UN GC – Environmental protection ▶ page 99

GRI indicator		Link/Comment
103-2	The management approach and its components	CRR: Management approach ▸ page 24 CRR: Our focus areas – Climate Action ▸ page 26 CRR: Commitments, positions and targets – Climate Action ▸ page 59 CRR: UN GC – Environmental protection ▸ page 99
103-3	Evaluation of the management approach	CRR: Management approach ▸ page 24 CRR: Our focus areas – Climate Action ▸ page 26 CRR: Commitments, positions and targets – Climate Action ▸ page 59 CRR: UN GC – Environmental protection ▸ page 99
GRI 302: Energy 2016		
302-1	Energy consumption within the organization	CRR: Key Performance Indicators – Climate Action – Total energy consumption ▸ page 34 Additional information: We do not sell significant quantities of energy to third parties. The consumption of the individual energy sources is converted into MWh using standard factors.
302-2	Energy consumption outside of the organization	Additional information: As part of our Impact Assessment, we have made a first assessment of energy consumption and GHG emissions in the supply chain. However, we are not yet reporting on this.
302-3	Energy intensity	CRR: Key Performance Indicators – Climate Action – Energy consumption KPIs ▸ page 34 Additional information: The reported energy intensity figure includes only the energy consumption within the organization.
302-4	Reduction of energy consumption	CRR: Key Performance Indicators – Climate Action – Trends in the emission sources included in the climate protection target ▸ page 34 CRR: Key Performance Indicators – Climate Action – Energy consumption KPIs ▸ page 34

Water and Effluents

GRI indicator		Link/Comment
GRI 303: Water and Effluents 2018		
303-1	Interactions with water as a shared resource	CRR: Key Performance Indicators – Water withdrawal and wastewater generated ▸ page 35

Emissions

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Environmental matters CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Climate Action ▶ page 26 CRR: Commitments, positions and targets – Climate Action ▶ page 59 CRR: UN GC – Environmental protection ▶ page 99
103-2	The management approach and its components	CRR: Management approach ▶ page 24 CRR: Our focus areas – Climate Action ▶ page 26 CRR: Commitments, positions and targets – Climate Action ▶ page 59 CRR: UN GC – Environmental protection ▶ page 99
103-3	Evaluation of the management approach	CRR: Management approach ▶ page 24 CRR: Our focus areas – Climate Action ▶ page 26 CRR: Commitments, positions and targets – Climate Action ▶ page 59 CRR: UN GC – Environmental protection ▶ page 99
GRI 305: Emissions 2016		
305-1	Direct (Scope 1) GHG emissions	CRR: Key Performance Indicators – Climate Action – Greenhouse gas emissions in t CO_2 ▶ page 32 Additional information: The indicators for greenhouse gases are reported in CO_2 equivalents and include all Kyoto gases. Biogenic Scope-1 emissions are not significant for us and are therefore not reported separately.
305-2	Energy indirect (Scope 2) GHG emissions	CRR: Key Performance Indicators – Climate Action – Greenhouse gas emissions in t CO_2 ▶ page 32 Additional information: The indicators for greenhouse gases are reported in CO_2 equivalents and include all Kyoto gases. Biogenic Scope-1 emissions are not significant for us and are therefore not reported separately.
305-3	Other indirect (Scope 3) GHG emissions	CRR: Key Performance Indicators – Climate Action – Greenhouse gas emissions in t CO_2 ▶ page 32 Additional information: The indicators for greenhouse gases are reported in CO_2 equivalents and include all Kyoto gases. Biogenic Scope-1 emissions are not significant for us and are therefore not reported separately.

GRI indicator		Link/Comment
305-4	GHG emissions intensity	CRR: Key Performance Indicators – Climate Action – Greenhouse gas emissions in kg CO_2 (CO_2 equivalents) per m^2 selling and delivery space ▶ page 32
305-5	Reduction of GHG emissions	CRR: Key Performance Indicators – Climate Action ▶ page 32 CRR: Key Performance Indicators – Climate Action – Trends in the emission sources included in the climate protection target ▶ page 34

Waste

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Environmental matters CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Food Waste ▶ page 26 CRR: Commitments, positions and targets – Food Waste ▶ page 53 CRR: UN GC – Environmental protection ▶ page 99
103-2	The management approach and its components	CRR: Management approach ▶ page 24 CRR: Our focus areas – Food Waste ▶ page 26 CRR: Commitments, positions and targets – Food Waste ▶ page 53 CRR: UN GC – Environmental protection ▶ page 99
103-3	Evaluation of the management approach	CRR: Management approach ▶ page 24 CRR: Our focus areas – Food Waste ▶ page 26 CRR: Commitments, positions and targets – Food Waste ▶ page 53 CRR: UN GC – Environmental protection ▶ page 99
GRI 306: Waste 2020		
306-1	Waste generation and significant waste-related impacts	CRR: Our focus areas – Food Waste ▶ page 26
306-2	Management of significant waste-related impacts	CRR: Key Performance Indicators – Amount of waste and recycling rate ▶ page 36 Additional information: The determination of the waste disposal method is based on the information provided by the waste disposal service providers we use. Key Performance Indicators – Food Waste

Environmental Compliance

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Environmental matters CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Climate Action ▶ page 26 CRR: Commitments, positions and targets – Climate Action ▶ page 59 CRR: UN GC – Environmental protection ▶ page 99
103-2	The management approach and its components	AR: Opportunities and risk report
103-3	Evaluation of the management approach	AR: Opportunities and risk report
GRI 307: Environmental Compliance 2016		
307-1	Non-compliance with environmental laws and regulations	AR: Opportunities and risk report

Supplier Environmental Assessment

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	AR: Combined non-financial statement of METRO AG – Environmental matters CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Climate Action ▶ page 26 CRR: Our focus areas – Organic and Responsible Products ▶ page 26 CRR: Our focus areas – Conscious Proteins ▶ page 26 CRR: Our focus areas – Raw Material Sourcing ▶ page 26 CRR: Commitments, positions and targets – Climate Action ▶ page 59 CRR: Commitments, positions and targets – Organic and Responsible Products ▶ page 54 CRR: Commitments, positions and targets – Conscious Proteins ▶ page 53 CRR: Commitments, positions and targets – Raw Material Sourcing ▶ page 55 CRR: UN GC – Environmental protection ▶ page 99

GRI indicator		Link/Comment
103-2	The management approach and its components	CRR: Our focus areas – Climate Action ▶ page 26 CRR: Our focus areas – Organic and Responsible Products ▶ page 26 CRR: Our focus areas – Conscious Proteins ▶ page 26 CRR: Our focus areas – Raw Material Sourcing ▶ page 26 CRR: Commitments, positions and targets – Climate Action ▶ page 59 CRR: Commitments, positions and targets – Organic and Responsible Products ▶ page 54 CRR: Commitments, positions and targets – Conscious Proteins ▶ page 53 CRR: Commitments, positions and targets – Raw Material Sourcing ▶ page 55
103-3	Evaluation of the management approach	CRR: Our focus areas – Climate Action ▶ page 26 CRR: Our focus areas – Organic and Responsible Products ▶ page 26 CRR: Our focus areas – Conscious Proteins ▶ page 26 CRR: Our focus areas – Raw Material Sourcing ▶ page 26 CRR: Commitments, positions and targets – Climate Action ▶ page 59 CRR: Commitments, positions and targets – Organic and Responsible Products ▶ page 54 CRR: Commitments, positions and targets – Conscious Proteins ▶ page 53 CRR: Commitments, positions and targets – Raw Material Sourcing ▶ page 55
GRI 308: Supplier Environmental Assessment 2016		
308-1	New suppliers that were screened using environmental criteria	CRR: Commitments, positions and targets – Climate Action ▶ page 59 CRR: Commitments, positions and targets – Organic and Responsible Products ▶ page 54 CRR: Commitments, positions and targets – Conscious Proteins ▶ page 53 CRR: Commitments, positions and targets – Raw Material Sourcing ▶ page 55 CRR: UN GC – Environmental protection ▶ page 99
308-2	Negative environmental impacts in the supply chain and actions taken	CRR: Commitments, positions and targets – Climate Action ▶ page 59 CRR: Commitments, positions and targets – Organic and Responsible Products ▶ page 54 CRR: Commitments, positions and targets – Conscious Proteins ▶ page 53 CRR: Commitments, positions and targets – Raw Material Sourcing ▶ page 55 CRR: UN GC – Environmental protection ▶ page 99

Social

Employment

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests
GRI 401: Employment 2016		
401-1	New employee hires and employee turnover	CRR: Key Performance Indicators – Diversity and Inclusion – New employees by gender ▶ page 46 CRR: Key Performance Indicators – Diversity and Inclusion – New employees by age ▶ page 46 CRR: Key Performance Indicators – Diversity and Inclusion – Employee turnover by gender ▶ page 41 CRR: Key Performance Indicators – Diversity and Inclusion – Employee turnover by age ▶ page 41

Labor/Management Relations

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership
GRI 402: Labor/Management Relations 2016		
402-1	Minimum notice periods regarding operational changes	Additional information: The rules on minimum notice periods vary from country to country.

Occupational Health and Safety

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety and health management AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety AR: Combined non-financial statement of METRO AG – Employee interests – KPIs for occupational safety and health AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety in times of Covid-19 CRR: UN GC – Human rights and labour standards ▶ page 94
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety and health management AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety AR: Combined non-financial statement of METRO AG – Employee interests – KPIs for occupational safety and health AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety in times of Covid-19 CRR: UN GC – Human rights and labour standards ▶ page 94 Additional information: We report on 24 countries (5 regions). The 5 regions are divided as follows: 1. Germany 2. West Europe (Austria, Belgium, France, Italy, Netherlands, Portugal, Spain) 3. East Europe (Bulgaria, Croatia, Czech Rep, Hungary, Kazakhstan, Moldova, Poland, Romania, Serbia, Slovakia, Turkey, Ukraine) 4. Russia 5. Asia (India, Japan, Pakistan) We do not collect information based on the gender of employees. We do not calculate absentee rate as this issue is not related to Safety, but HR.
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety and health management AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety AR: Combined non-financial statement of METRO AG – Employee interests – KPIs for occupational safety and health AR: Combined non-financial statement of METRO AG – Employee interests – Occupational safety in times of Covid-19 CRR: UN GC – Human rights and labour standards ▶ page 94
GRI 403: Occupational Health and Safety 2016		
403-1	Occupational health and safety management system	Additional information: 16 countries report that a joint management–worker health and safety committee has been established at the entity or store level. Joint management – worker OHS committees are made up in equal numbers of workers' representatives (elected) and management representatives or in accordance with local legislations

GRI indicator		Link/Comment
403-2	Hazard identification, risk assessment, and incident investigation	CRR: Key Performance Indicators – Human Rights – Lost-time injury frequency rate (LTIFR) per million hours worked ▶ page 37
403-3	Occupational health services	Additional information: We have no such works with a high incidence or high risk of specific diseases.
403-4	Worker participation, consultation, and communication on occupational health and safety	Additional information: 8 countries have formal agreements with trade unions, 4 countries have no trade union at all. All others do not have formal agreements with trade unions. In all countries where there are trade unions, the cooperation between the employer and the trade unions, and the responsibilities of both parties, are described in local legislation. OHS topics are covered by this agreements by 100%.

Training and Education

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests – Training and development
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Training and development
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Training and development
GRI 404: Training and Education 2016		
404-1	Average hours of training per year per employee	CRR: Key Performance Indicators – Diversity and Inclusion – Continuing professional development ▶ page 50 Reason for omission: The breakdown by gender and employee groups is not a relevant factor for us and is therefore not published.
404-2	Programs for upgrading employee skills and transition assistance programs	AR: Combined non-financial statement of METRO AG – Employee interests – Training and development AR: Combined non-financial statement of METRO AG – Employee interests – Employee development and retention AR: Combined non-financial statement of METRO AG – Employee interests – Talent Management & Succession Planning

Diversity and Equal Opportunity

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Diversity and Inclusion ▶ page 26 CRR: Commitments, positions and targets – Diversity and Inclusion ▶ page 59 CRR: UN GC – Human rights and labour standards ▶ page 94 AR: Combined non-financial statement of METRO AG – Employee interests – Diversity and Inclusion AR: Combined non-financial statement of METRO AG – Employee interests – Equal opportunities at work
103-2	The management approach and its components	CRR: Management approach ▶ page 24 CRR: Our focus areas – Diversity and Inclusion ▶ page 26 CRR: Commitments, positions and targets – Diversity and Inclusion ▶ page 59 CRR: UN GC – Human rights and labour standards ▶ page 94
103-3	Evaluation of the management approach	CRR: Management approach ▶ page 24 CRR: Our focus areas – Diversity and Inclusion ▶ page 26 CRR: Commitments, positions and targets – Diversity and Inclusion ▶ page 59 CRR: UN GC – Human rights and labour standards ▶ page 94
GRI 405: Diversity and Equal Opportunity 2016		
405-1	Diversity of governance bodies and employees	CRR: Key Performance Indicators – Diversity and Inclusion – Gender breakdown in managerial positions ▶ page 47 CRR: Key Performance Indicators – Diversity and Inclusion – Gender breakdown in managerial positions top management ▶ page 47 CRR: Key Performance Indicators – Diversity and Inclusion – Gender breakdown in managerial positions junior management ▶ page 47 CRR: Key Performance Indicators – Diversity and Inclusion – Gender breakdown in managerial positions of revenue generating units ▶ page 47 CRR: Key Performance Indicators – Diversity and Inclusion – Managers by age ▶ page 47 CRR: Key Performance Indicators – Diversity and Inclusion – Number of nationalities among managers ▶ page 47 CRR: Key Performance Indicators – Diversity and Inclusion – Employees ▶ page 41 CRR: Key Performance Indicators – Diversity and Inclusion – Employees by age group ▶ page 41 CRR: Key Performance Indicators – Diversity and Inclusion – Employees with a recognised severe disability or equivalent status ▶ page 41 CRR: Key Performance Indicators – Diversity and Inclusion – Employees by age group ▶ page 41 CRR: Key Performance Indicators – Diversity and Inclusion – Number of nationalities ▶ page 41

Freedom of Association and Collective Bargaining

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94

GRI indicator		Link/Comment
GRI 407: Freedom of Association and Collective Bargaining 2016		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: UN GC – Human rights and labour standards ▶ page 94 Additional information: Human rights Raw material sourcing

Child Labor

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94

GRI indicator		Link/Comment
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94
GRI 408: Child Labor 2016		
408-1	Operations and suppliers at significant risk for incidents of child labor	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: UN GC – Human rights and labour standards ▶ page 94 Additional information: Human rights Raw material sourcing

Forced or Compulsory Labor

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58

GRI indicator		Link/Comment
		CRR: UN GC – Human rights and labour standards ▶ page 94
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94
GRI 409: Forced or Compulsory Labor 2016		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: UN GC – Human rights and labour standards ▶ page 94 Additional information: Human rights Raw material sourcing

Security Practices

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
GRI 410: Security Practices 2016		
410-1	Security personnel trained in human rights policies or procedures	Reasons for omission: Security personnel working on behalf of METRO are in the scope of METRO's principles on Fair Working Conditions & Social Partnership hence considered as third-party organisations as per GRI-410. We cannot report on percentage of trained personnel as this data is not collected.

Rights of Indigenous Peoples

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
GRI 411: Rights of Indigenous Peoples 2016		
411-1	Incidents of violations involving rights of indigenous peoples	Additional information: Complying with the rights of indigenous people is generally covered by METRO's Human Rights Policy as this document refers to all Human Rights as articulated in the Universal Declaration of Human Rights and the Declaration on Fundamental Principles and Rights at Work by the International Labour Organization (ILO). There has been no identified incident of violations involving the rights of indigenous peoples during the reporting period.

Human Rights Assessment

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94 Additional information: Global principles on fair working conditions amfori BSCI Code of Conduct
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94 Additional information: Global principles on fair working conditions amfori BSCI Code of Conduct

GRI indicator		Link/Comment
GRI 412: Human Rights Assessment 2016		
412-1	Operations that have been subject to human rights reviews or impact assessments	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: UN GC – Human rights and labour standards ▶ page 94
412-2	Employee training on human rights policies or procedures	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: UN GC – Human rights and labour standards ▶ page 94
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: UN GC – Human rights and labour standards ▶ page 94

Local Communities

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94 Additional information: Global principles on fair working conditions amfori BSCI Code of Conduct
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Employee interests – Fair working conditions and social partnership AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94 Additional information: Global principles on fair working conditions amfori BSCI Code of Conduct
GRI 413: Local Communities 2016		
413-1	Operations with local community engagement, impact assessments, and development programs	Additonal information: METRO is signatory of the Accord on Fire and Building Safety in Bangladesh which engages with workers from Ready Made Garment sector in Bangladesh as a multi-stakeholder initiative

Supplier Social Assessment

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: Management approach ▶ page 24 CRR: Our focus areas – Human Rights ▶ page 26 CRR: Commitments, positions and targets – Human Rights ▶ page 58 CRR: UN GC – Human rights and labour standards ▶ page 94
GRI 414: Supplier Social Assessment 2016		
414-1	New suppliers that were screened using social criteria	AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: UN GC – Human rights and labour standards ▶ page 94 Additonal information: Social criteria form a general contractual element (paragraph on social standards) in all own brand and brand contracts as well as through our Code of Conduct. Active screening for suppliers of own brand non-food products happens automatically during the on-boarding into our social standard process as compliance with social criteria is a prerequisite for becoming a new supplier but new suppliers are not tagged as “new“ in our system. For own brand food-suppliers the process described before has been set-up recently.
414-2	Negative social impacts in the supply chain and actions taken	AR: Combined non-financial statement of METRO AG – Social matters – Respect for human rights AR: Combined non-financial statement of METRO AG – Social matters – Global labour and social standards in the supply chain and supplier development CRR: UN GC – Human rights and labour standards ▶ page 94

Customer Health and Safety

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13 CRR: Management approach ▶ page 24 CRR: Our focus areas – Organic and Responsible Products ▶ page 26 CRR: Commitments, positions and targets – Organic and Responsible Products ▶ page 54 AR: Opportunities and risk report
103-2	The management approach and its components	CRR: Management approach ▶ page 24 CRR: Our focus areas – Organic and Responsible Products ▶ page 26 CRR: Commitments, positions and targets – Organic and Responsible Products ▶ page 54 AR: Opportunities and risk report
103-3	Evaluation of the management approach	CRR: Management approach ▶ page 24 CRR: Our focus areas – Organic and Responsible Products ▶ page 26 CRR: Commitments, positions and targets – Organic and Responsible Products ▶ page 54 AR: Opportunities and risk report
GRI 416: Customer Health and Safety 2016		
416-1	Assessment of the health and safety impacts of product and service categories	CRR: Key Performance Indicators – Reformulated products ▶ page 31 AR: Opportunities and risk report

Customer Privacy

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13
103-2	The management approach and its components	AR: Combined non-financial statement of METRO AG – Protection of personal data
103-3	Evaluation of the management approach	AR: Combined non-financial statement of METRO AG – Protection of personal data
GRI 418: Customer Privacy 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	AR: Combined non-financial statement of METRO AG – Protection of personal data Reason for omission: The topic of protection of personal data is material for METRO, nevertheless we do not report openly on substantiated complaints concerning breaches of customer privacy and losses of customer data due to reasons of compliance with the obligation of secrecy.

Socioeconomic Compliance

GRI indicator		Link/Comment
GRI 103: Management approach 2016		
103-1	Explanation of the material topic and its Boundary	CRR: Materiality analysis 2019/20 ▶ page 13
103-2	The management approach and its components	CRR: UN GC – Anti-corruption measures ▶ page 102 AR: Combined non-financial statement of METRO AG – Combating corruption and bribery AR: Opportunities and risk report Additional information: Corporate Governance
103-3	Evaluation of the management approach	CRR: UN GC – Anti-corruption measures ▶ page 102 AR: Combined non-financial statement of METRO AG – Combating corruption and bribery AR: Opportunities and risk report Additional information: Corporate Governance
GRI 419: Socioeconomic Compliance 2016		
419-1	Non-compliance with laws and regulations in the social and economic area	CRR: UN GC – Anti-corruption measures ▶ page 102 AR: Combined non-financial statement of METRO AG – Combating corruption and bribery AR: Opportunities and risk report Additional information: Corporate Governance Reasons for omission: The topic of compliance is material for METRO, nevertheless we do not report openly on non-compliance with laws and regulations in the social and economic area unless we have to due to legal obligations.

UNITED NATIONS GLOBAL COMPACT

Being a member of the United Nations Global Compact – the world's largest initiative for corporate responsibility – helps METRO to firmly embed sustainability in its company strategy. As well as this, it provides the right framework for our long-term commitment to responsible and ethical business practices.
With this Communication on Progress, METRO is fulfilling its obligation to demonstrate which guidelines and measures it is using to improve its performance in the fields of human rights, working standards, environmental protection and the elimination of corruption and to ensure that the Global Compact's 10 basic principles are adhered to in strategic decision-making and day-to-day work both now and in the future.
Düsseldorf, December 2020

United Nations Global Compact Communication on Progress 2019/20

In the following tables, we show examples of commitments and management systems that serve the 10 principles, measures that we have taken and results that we achieved in the reporting period 2019/20.

- Human rights and labour standards ▸ page 94
- Environmental protection ▸ page 99
- Anti-corruption measures ▸ page 102

Human rights and labour standards

PRINCIPLE 1: Support for human rights

PRINCIPLE 2: Elimination of human rights abuses

PRINCIPLE 3: Freedom of association and the right to collective bargaining

PRINCIPLE 4: Elimination of all forms of forced labour

PRINCIPLE 5: Abolition of child labour

PRINCIPLE 6: Elimination of discrimination

Commitments and management systems

- Key labour standards of the ILO (International Labour Organization), embedded in a variety of corporate guidelines
- OECD Guidelines for Multinational Enterprises, embedded in a variety of corporate guidelines
- International standards throughout the supply chain (amfori BSCI, Sedex SMETA, RSPO etc.)
- METRO Business Principles
- Code of Conduct for Business Partners
- METRO Human Rights Guidelines in its own business operations and entire supply chain
- METRO Anti-discrimination tenet
- Policy social standards for all own brand suppliers producing in risk countries
- Social standards clause in supplier contracts
- The Accord on Fire and Building Safety in Bangladesh
- METRO guidelines on fair working conditions and social partnership
- The Consumer Goods Forum Resolution on Forced Labour
- The Consumer Goods Forum Resolution on Health & Wellness

Measures 2019/20

- Continuous auditing of non-food, near-food and food producers according to Amfori Business Social Compliance Initiative (Amfori BSCI), sedex audit according to SMETA or equivalent social standard systems. In accordance with a risk approach, this applies to all producers in defined risk countries (according to Amfori BSCI assessment) in METRO Sourcing International (MSI) and METRO Food Sourcing (MFS) have imported goods manufactured, as well as to all producers who produce private label or own-import articles for our sales divisions. The national companies were trained in the roll-out for near-food and food suppliers (valid since June 1, 2019) and are to be gradually integrated into the process over the next 1-2 years.
- Training of suppliers in the reporting year on aspects of the implementation of fair working conditions and human rights. This was especially important during the Covid-19 crisis, as it allowed us to compensate for the absence of Amfori BSCI and Sedex audits by taking bridging measures: we offered support to producers with questionnaires, instructions and discussions, fulfilling our duty of care to give weight to respect for human rights even without audits.
- Training for employees in key positions, especially on the subject of forced labor. The training content is based on our commitments to the United Nations (UN) Universal Declaration of Human Rights, the International Human Rights Charter, the OECD Guidelines for Multinational Enterprises, the UN Guidelines on Business and Human Rights, as well as the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO).
- Participation in the benchmarking process of the Social Standards Compliance Initiative of the Consumer Goods Forum.
- METRO is still a member of the agreement on fire protection and building security in Bangladesh.
- Auditing of the METRO national companies for compliance with the guidelines on fair working conditions and social partnership (FWC & SP).
- Developing of various occupational safety measures.
- Various events organized by the employee network “Women in Trade (WiT)”, which are designed to help increase the proportion of women in management positions on a sustainable basis, promote internal and external dialog and create better conditions for women in the Group. 6 WiT country networks are active in France, Portugal, Japan, Pakistan, Germany and Bulgaria. The number of network members at the Düsseldorf location is now around 600.

The colour-coding highlights the corresponding measures and achievements
Items with this bullet point do not have any corresponding passages

- In the process of revising the strategy and due the positive development in terms of achieving the goal of increasing the share of women in management positions at METRO AG and METRO Wholesale, we have shortened the target achievement date of the current gender targets set by the Management Board on 26 July 2017 to 30 September 2020 (originally: 30 June 2022) and set new targets for September 2025. Until September 2025, METRO AG aims to have 25% women in the 1st management level below the Management Board and 40% in the 2nd management level below the Management Board. In addition, we have again voluntarily set ourselves a target for the proportion of women in management positions in our wholesale business. Until September 2025 the proportion of women in management positions on levels 1 to 3 (including store managers) should be 30% worldwide.
- The METRO PRIDE employee network for lesbians, gays, bisexuals, transgender and intersexuals aims to raise awareness of the issues of sexual orientation and identity. In the fiscal year, the network was involved, among other things, in the initiative to amend the guideline “Hemotherapy for more non-discriminatory blood donation in Germany”.
- Involvement in the LEAD (Leading Executives Advancing Diversity) network, where METRO is a member since 2016. The non-profit network on European level is working for more women in the retail and consumer goods industry and to promote them in their careers in order to increase the proportion of women in management positions in these industries.
- METRO offers all employees e-training on the topic of “Diversity & Inclusion”. During the fiscal year, 888 participants completed the training. The aim of the training is to ensure a common understanding of diversity & inclusion in general and at METRO. In addition, the eTraining highlights the importance of the topic in the business environment within METRO.
- METRO organizes a discussion round, on the occasion of the German Diversity Day, in the METRO internal MORE Stage format.
- METRO maintains a constant exchange with works councils and unions, nationally and internationally. Plenary meetings are held once a year with a training event for all employee representatives of the Euro Forum and up to three times a year with the steering committee of the METRO Euro Forum, our European Works Council and management representatives. There is also a regular social dialogue with the international trade union organization UNI Global Commerce at a global level, where, among other things, the commitment to fair working conditions and social partnership is discussed.

Achievements 2019/20

- By 30 September 2020, 675 of 863 active private label non-food producers and 60 of 109 corresponding food/near-food producers had been audited. Of these, 99% (665) of non-food producers and 100% (60) of food/near-food producers passed the audit.
- In the reporting year METRO Sourcing International, trained 100 producers with 208 participants on the subject of human rights and fair working conditions. On the occasion of the Covid-19 pandemic, an additional 192 questionnaires and personal interviews were sent out and evaluated on the subject of economic, but also social challenges in connection with the pandemic, and appropriate measures, like extended payment terms, were agreed.
- Training course for employees in key positions, especially on the subject of forced labor: since the start of the project in fiscal year 2017/18, the national companies in Turkey, Pakistan, Ukraine and Bulgaria have taken part, and in fiscal year 2019/20 Spain, Serbia, Croatia and Myanmar.
- As of September 30, 2020, the factories reported in the agreement on fire protection and building security in Bangladesh that produce for METRO Sourcing International and/or METRO national companies have completed 95% of their points for improvement.
- Since fiscal year 2016/17, detailed audits on compliance with METRO's FWC & SP principles have taken place at 15 national companies (head offices, stores and distribution centers) (Pakistan, Bulgaria, Japan, Hungary, Italy, Serbia, India, Slovakia, Moldova, Spain, Russia, Croatia, Kazakhstan, Portugal and France). This audit based on the UN Guiding Principles on Business and Human Rights and, in addition to the 7 global METRO FWC & SP Principles, also covers, among other things, employee data protection and the quality of employee involvement and communication. Due to Covid-19, no on-site audits were carried out in the reporting period. Instead, the audit procedure was changed and a survey on the FWC & SP Principles was conducted from May to July 2020. Thereafter, limited audits were conducted at 5 selected METRO companies. The aim was to assess the current status of implementation of the FWC & SP Principles in key units and to make recommendations for improving the FWC & SP process.
- Approval of the new METRO Group-wide Operational Safety Management System (OSMS) OSMS guidelines (approved by Management Board on 8 September 2020) and the OSMS manual (publication at the end of calendar year 2020). The guideline structures the safety environment of METRO in accordance with ISO 45001 requirements ("Occupational Safety Management Systems"). It was developed to establish global guidelines and processes for operational safety management in the company and provides an overarching structure, basic text and common terms with core definitions. It serves as a framework to enable METRO units to effectively manage operational safety. The handbook will support the units in developing and implementing an effective OSMS. It provides practical tools for processes and procedures involved in the development, implementation and maturation of operational safety management systems and provides information on how the operational safety management system can be used to improve the safety, efficiency and effectiveness of the unit.

additional services to increase occupational safety:

- Training and information campaigns to reduce safety incidents
- Implementation of the annual health and safety
- Certification of METRO Ukraine according to ISO 45001
- Developing a procedure for managing contractors in Makro Belgium
- Establishing the “golden safety rules” in METRO France

The proportion of women at management levels 1-3 METRO-wide was 25% at the reporting date on September 30, 2020. Ms. Andrea Euenheim has been a member of the Management Board since November 2019, which means that the target of having at least one woman on the Management Board as of June 30, 2022, has already been reached ahead of schedule. In addition, the target for June 30, 2022, of a 35% share of women at the 2nd management level below the Executive Board was already achieved at September 30, 2020, with a proportion of 36%.

Various activities of the employee network WiT:

- Implementation of the annual WiT conference with 80 participants in different workshops and discussion formats
- Monthly digital Lunch & Learn Meetings with up to 20 participants
- 24 participants in the training “The Brand ICH”

Various activities of the employee network METRO PRIDE:

- 2 METRO employees are represented on the TOP 100 OUT EXECUTIVES list 2019, 1 METRO employee takes second place on the TOP 20 FUTURE LEADER list 2019 This is a joint project of the PROUT AT WORK Foundation and UHLALA GmbH. The project aims to make LGBT+ visible as role models.
- METRO, together with PROUT-AT-WORK and 12 other companies, publishes a position paper on easing discriminatory restrictions on blood donations for homosexuals, bisexual men and trans*People.
- METRO is founding partner of We stay Pride. The LGBT+ Employer Excellence Program of the UHLALA Group supports companies in living diversity all year round. The 12-month program bundles the offers and brands of the UHLALA Group for member companies and helps to firmly anchor LGBT+ diversity in the corporate culture. The program makes it possible to make diversity and successes within and outside the partner companies tangible and visible.

Olaf Koch, CEO METRO AG, signed the CEO Pledge of the LEAD network. With his signature METRO commits itself to promote gender equality and inclusion in the retail and consumer goods industry (CPG).

Environmental protection

PRINCIPLE 7: Preventive environmental protection

PRINCIPLE 8: Promoting greater responsibility for the environment

PRINCIPLE 9: Dissemination of environmentally friendly technologies

Commitments and management systems

- Purchasing policy for sustainable procurement, along with specific purchasing guidelines for fish and seafood, meat, caged eggs, palm oil, paper and wood, soy, packaging and disposable plastic.
- Use of international standards along the supply chain (GlobalG.A.P., IFS)
- METRO Environmental guideline
- METRO Water Policy
- Energy management systems according to ISO 50001
- METRO climate protection target: reducing greenhouse gas emissions of the Scope 1 and Scope 2 CO_2 emissions by 60% per m^2 of selling and delivery space by 2030 compared to 2011 and of absolute Scope 3 CO_2 emissions by 15% by 2030 compared to 2018
- Company car guideline with incentive system for more fuel-efficient vehicles
- “EV100”(electric vehicle joining commitment) Commitment
- The Consumer Goods Forum Resolution on Deforestation
- The Consumer Goods Forum Resolution on Sustainable Refrigeration
- The Consumer Goods Forum Resolution on Food Waste
- World Ressource Institute 10x20x30 Commitment
- Membership in the Roundtable on Sustainable Palm Oil (RSPO)
- Membership in the Palm Oil Transparency Coalition (POTC)
- Membership in the Round Table on Responsible Soy (RTRS)
- Membership in the Retailer Cocoa Coalition
- Membership in the Global Sustainable Seafood Initiative (GSSI)
- Membership in the Global Tuna Alliance (GTA)
- Signing of the Tuna 2020 Traceability Declaration
- Signing of the Cerrado Manifesto Statement of Support
- Signing of the Ellen MacArthur New Plastics Economy Global Commitment

Measures 2019/20

- Implementing the general buying policy for sustainable procurement and the specific buying guidelines for fish and seafood, meat, caged eggs, palm oil, paper and wood, soy, packaging and disposable plastic as well for the resulting range of certified products or products with enhanced sustainability performance
- Enhanced impact analysis in METRO Bulgaria with focus on the effects of local products on environment and society
- Measures for behavioural change (Energy Awareness Programme), investment in energy efficiency and renewable energies (Energy-Saving Programme), changeover of refrigeration systems to natural refrigerants (F-Gas Exit Programme)
- Recertification and annual check of energy management systems in accordance with ISO 50001 and the environmental management system ISO 14001
- Engagement with various stakeholders to combat food waste
- Recovery of resources by recycling
- Transparent public reporting on climate change, water and forest via the CDP climate change programme, the CDP water programme and the CDP forest programme
- Participation in the committees Global Tuna Alliance (GTA) und Global Sustainable Seafood Initiative (GSSI)
- ☐ Participation in the Biodiversity Guidance Navigation Tool (accompanying the Natural Capital Protocol) in cooperation with the Cambridge Conservation Initiative (CCI) and the Capitals Coalition

Achievements 2019/20

- Extending the functionalities of the inter-branch traceability system to combat illegal fishing with more detailed information on the product, production and suppliers, e.g. information on the composition of feed for aquaculture products, average nutritional values and display of certificates
- Conversion of suppliers of vacuum packed meat and carcasses in METRO Turkey to the GS1-128 barcode label system to present the expiration date, batch number and ear-tag number on the invoice to the customers
- Strengthen local suppliers and marketing of organic products e.g. in METRO Moldova and METRO Bulgaria by communication campaigns
- Reduce greenhouse gas emissions per m^2 sales and delivery area by 34.3% compared to 2011
- Reduce greenhouse gas emissions from refrigerant losses per m^2 sales and delivery area by 24.4% compared to 2011
- Reduce electricity consumption per m^2 sales and delivery area by 7.9% compared to 2011
- Investments of € 5.1 million in fiscal year 2019/20, among other within the framework of the Energy Saving Program. Thereby we will save approx. 1.4 million € annually in future energy costs
- Implementation of the first transcritical refrigeration systems in Slovakia and in further projects in Germany, France, Italy, Belgium and Romania
- Replacement of the last CFC systems by natural refrigerants in all markets in Russia

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The colour-coding highlights the corresponding measures and achievements
☐ Items with this bullet point do not have any corresponding passages

- Installation of 14 additional photovoltaic systems in France, Belgium, Bulgaria, Austria, India and Pakistan, with a total additional capacity of 7,086 kWp
- Establish 460 charging stations for electric vehicles for METRO customers. 170 employees at the Düsseldorf campus already use electric vehicles as company cars, whose emissions are offset by certificates for hydroelectric power systems.
- Certification of all METRO locations in Germany until 20 August 2021 and France until 29 April 2021 according to the energy management system ISO 50001
- Certification of all METRO Ukraine stores according to the environmental management system ISO 14001
- Cooperation in 22 METRO countries with food banks and social institutions to avoid food waste in the markets including our restaurants and warehouses
- Cooperation or initiating cooperation in 9 METRO countries with Too Good To Go (TGTG) to reduce food waste in our own operations (wholesale store and restaurant) together with our customers. In the 17 Dutch stores, were sold 46,891 TGTG bags between 1 October 2019 and 30 September 2020 and saving 117,227 kg CO_2
- Cooperation with 20 of METRO's most important business partners as part of the "10x20x30" initiative, working together to reduce food waste along the supply chain
- With the implementation of a digital platform, developed by our partner Whole Surplus, METRO Turkey now has a basis methodology for systematically measuring and managaing of food waste in its own business operations while reducing food waste. In the year 2019, 30 METRO wholesale stores in Turkey recorded 5,293 tons of food waste. Of this, 1,247 tons were delivered to animal shelters as animal feed, 3,870 tons were disposed of at landfills and 163.5 tons were donated via the Turkish food bank organization. Between January and June 2020, 2,458 tons of food waste were registered, 654 tons of which were delivered to animal shelters as animal feed, 1,674 tons were disposed of in landfills and 97.7 tons were donated through the Turkish food bank organization.
- Establishment of 9 waste collection points in METRO Ukraine stores where polyethylene (PET) bottles, glass bottles, aluminum cans, waste paper and Tetra Pak packages are collected and handed over for recycling. On average 100–500 people use the waste collection points per month and each person disposes of 2 to 10 kilograms of secondary raw materials. In this way about 12 tons of secondary raw materials are collected every month.
- Engagement of 170 suppliers in the CDP supply chain program for water, climate change and forests with up to 59% return rate.
- Reduce of water consumption per m^2 of sales and delivery area by –15% compared to 2011, and by under –6% compared to the previous year
- Participation at the publication of the GDST (Global Dialogue on Seafood Traceability) Traceability Standard 1.0
- Participation in various international conferences on the topic of Tuna Traceability Declaration and transparency in the supply chain

Anti-corruption measures

PRINCIPLE 10: Combating corruption

Commitments and management systems

- OECD Guidelines for multinational Enterprises, embedded in a variety of corporate guidelines
- Compliance Management System according to the audit standard 980 of the Institute of Auditors (IdW PS980)
- METRO Business Principles
- METRO Anti-corruption guideline
- METRO Consultant guidelines
- Digital due diligence process for business partners (risk-based)

Measures 2019/20

- Compliance communication in various – internal and external – formats to inform employees and third parties outside the company, including the METRO social network platform
- Continuous implementation of the anti-corruption policy in day-to-day business
- The IT tool CDDS (Compliance Due Diligence Solution) for digital business partner auditing has been rolled out and almost completely implemented company wide. For high-risk business partners, an extended due diligence assessment is planned, which will include the auditing of external databases.
- Membership and participation in the Alliance for Integrity, an anti-corruption initiative of the German Federal Ministry for Economic Cooperation and Development and the United Nations Global Compact

Achievements 2019/20

- Examples of internal communication measures:
  - Compliance training on anti-corruption in various group-companies in central functions and in sales, partly as e-training
  - Compliance-Talks
  - Compliance presence on METRO's social network
  - Communication campaign on the subject Speak-up (e.g. tissue boxes & posters)
  - Tones from the top in various group-companies on the content of the anti-corruption policy (e.g. acceptance of gifts)

The colour-coding highlights the corresponding measures and achievements
Items with this bullet point do not have any corresponding passages

Examples of external communication measures

- Business guidelines on METRO's websites – with access to the Compliance Reporting System
- Code of Conduct for business partners on the METRO websites
- Anti-corruption clause applied in external contracts, graded according to the risk of the business partner

Compliance Risk Workshops in various group-companies (depending on the level of risk) to identify corruption risks and compliance with guidelines

Workshops in almost all METRO companies to simplify and ensure the use of the digital tool (CDDS) company-wide, including the introduction of monitoring at corporate level of the reported cases

ABOUT THIS REPORT

REPORT PROFILE

Transparent reporting

This Corporate Responsibility Report 2019/20 was prepared in accordance with the GRI standards and fulfils the 'Core' option. You will find the GRI content index here ▸ page 60. In the Corporate Responsibility progress report 2018/19 we have incorporated our targets into the section of our KPIs. This year we report on them together with our commitments in a dedicated chapter ▸ page 53.

Reporting period

The reporting period is the financial year 2019/20 (1 October 2019 to 30 September 2020). To provide updates on developments, information has also been included that relates to periods prior to 2019/20. In the interests of topicality, we have also taken into account events which occurred up to the time of going to press (9 December 2020). The frame of reference for each of our targets and measures is indicated in the relevant section.

METRO reports on its sustainability performance each year by publishing either a progress report or a Corporate Responsibility Report. A Corporate Responsibility progress report was produced for financial year 2018/19, which was published on 11 December 2019.

Limitations of the report

The scope of applicability of the information is given in the respective texts, key performance indicators or targets. Unless expressly stated otherwise, all presentations refer to continuing operations (excluding the hypermarket business and excluding METRO China).

United Nations Global Compact

Since 2010, METRO has subscribed to the principles of the UN Global Compact ▸ page 93, a United Nations-led global initiative that aims to encourage businesses to adopt universal sustainability principles. By subscribing to the United Nations Global Compact, we have committed ourselves to continuous improvements in the areas of human rights, labour standards, environmental protection and anticorruption measures. With this Corporate Responsibility Report 2019/20 that is available online, METRO meets its obligation to demonstrate how improvements have been made within these areas.

Independent external assurance of the CR Report 2019/20

We strive to continuously improve our sustainability management. Having our report audited externally is a means of emphasising the credibility and transparency of our sustainability reporting. The quantitative and qualitative sustainability performance information included in the scope of the limited assurance engagement was conducted by KPMG AG Wirtschaftsprüfungsgesellschaft according to ISAE 3000 and ISAE 3410. It was not part of the engagement to review product and service related information, references to external websites and information sources, as well as future-related statements in the Report. The certification from the independent auditor can be viewed under assurance report ▸ page 106.

Disclaimer

This Corporate Responsibility Report contains forward-looking statements that are based on certain assumptions and expectations at the time of its publication. These statements are therefore subject to risks and uncertainties, which means that actual results may differ substantially from the future-oriented statements made here. Many of these risks and uncertainties are determined by factors that are beyond the control of METRO and cannot be gauged with any certainty at this point in time. These include future market conditions and economic developments, the behaviour of other market participants, the achievement of expected synergy effects as well as legal and political decisions. METRO does not feel obliged to publish corrections to these forward-looking statements to reflect events or circumstances that occur after the publication date of this material.

Join in the dialogue

Dialogue with all of our stakeholders such as you as our readers is important to us because it shows us what you expect of our company and where we can make further improvements. We would therefore like to hear any questions or comments you may have about the METRO Corporate Responsibility Report 2019/20 and our sustainability activities in general. Want to share some thoughts with us? Find us and our latest activities on Twitter and LinkedIn or send us an e-mail: CR@metro.de

LIMITED ASSURANCE REPORT OF THE INDEPENDENT AUDITOR REGARDING SUSTAINABILITY INFORMATION[1]

To the Management Board of METRO AG, Düsseldorf

We have performed an independent limited assurance engagement on the sustainability information published in the "Corporate Responsibility Report 2019/20" (further "Report") for the period October 1, 2019 to September 30, 2020 of METRO AG, Düsseldorf (further "METRO" or "Company"), published online at https://reports.metroag.de/corporate-responsibility-report/2019-2020/.

It was not part of our engagement to review product- and service-related information, references to external websites and information sources, as well as future-related statements in the Report. As disclosed in the section 'Social audits', certifications on manufacturing facilities of suppliers were conducted by external certification firms mandated by METRO to ensure compliance with the environmental, social and health standards of the amfori Business Social Compliance Initiative (BSCI) or equivalent standards. The appropriateness and accuracy of the conclusions from the audit/certification work performed was not part of our limited assurance procedures.

Management's Responsibility

The management board of METRO is responsible for the preparation of the Report and the determination and presentation of the sustainability information in accordance with the Reporting Criteria. METRO applies the principles and standard disclosures of the Sustainability Reporting Standards of the Global Reporting Initiative (GRI), the Corporate Accounting and Reporting Standard (Scope 1 and 2) and the Corporate Value Chain (Scope 3) Standard of World Resources Institute/World Business Council for Sustainable Development, supported by internal guidelines (further: Reporting Criteria).

This responsibility of the management board includes the selection and application of appropriate methods to prepare the Report and the use of assumptions and estimates for individual disclosures, which are reasonable under the given circumstances. Furthermore, the responsibility includes designing, implementing and maintaining internal controls deemed relevant for the preparation of the Report in a way that is free of – intended or unintended – material misstatements.

Independence and quality assurance on the part of the auditing firm

We are independent from the Company in accordance with the requirements of independence and quality assurance set out in legal provisions and professional pronouncements and have fulfilled our additional professional obligations in accordance with these requirements.

Our audit firm applies the legal provisions and professional pronouncements for quality assurance, in particular the professional code for German Public Auditors and Chartered Accountants (in Germany) and the quality assurance standard of the German Institute of

1 Our engagement applied to the German version of the Corporate Responsibility Report 2019/20. This text is a translation of the Independent Assurance Report issued in the German language, whereas the German text is authoritative.

Public Auditors (Institut der Wirtschaftsprüfer, IDW) regarding quality assurance requirements in audit practice (IDW QS 1).

Practitioner's Responsibility

It is our responsibility to express a conclusion based on our work performed as a limited assurance engagement for the Report.

We conducted our work in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): "Assurance Engagements other than Audits or Reviews of Historical Financial Information" and the International Standard on Assurance Engagements (ISAE) 3410: "Assurance Engagements on Greenhouse Gas Statements" of the International Auditing and Assurance Standards Board (IAASB). These standards require us to plan and perform the assurance engagement to allow us to conclude with limited assurance that no matters have come to our attention that cause us to believe that the Report was not prepared, in all material respects, in accordance with the Reporting Criteria. We do not issue a separate conclusion for each sustainability disclosure. In a limited assurance engagement the evidence gathering procedures are more limited than in a reasonable assurance engagement and therefore less assurance is obtained than in a reasonable assurance engagement. The choice of audit procedures is subject to the auditor's own judgement.

Within the scope of our work, we performed amongst others the following procedures:

- Interviews of group-level employees responsible for the materiality analysis in order to reach an understanding of the process for identifying material topics and respective reporting boundaries for METRO.
- A risk assessment, including a media research, of relevant information about the sustainability performance of METRO in the reporting period.
- Evaluation of the design and implementation of systems and processes for the collection, processing and monitoring of disclosures on environmental, employee and social matters, human rights, anti-corruption and bribery, including data consolidation.
- Inquiries of personnel at group level who are responsible for determining disclosures on concepts, due diligence processes, results and risks, the implementation of internal controls and the consolidation of disclosures.
- Evaluation of selected internal and external documents.
- An analytical review including trend analyses of the quantitative data submitted by all sites for consolidation at Group level.
- Assessment of local data collection and reporting processes as well as of the reliability of reported data via a sampling survey at METRO AG, METRO Energy Management and MCC Austria (via videoconference), MCC Romania (via videoconference).
- Assessment of the overall presentation of the disclosures.

Conclusion

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the sustainability information in the Corporate Responsibility Report 2019/20 of METRO, published online at https://reports.metroag.de/corporate-responsibility-report/2019-2020/ for the period October 1, 2019 to September

30, 2020, is not prepared, in all material respects, in accordance with the Reporting Criteria.

Restriction of Use/Clause on General Engagement Terms

This report is issued for purposes of the Management Board of METRO AG, Düsseldorf, only. We assume no responsibility with regard to any third parties.

Our assignment for the Management Board of METRO AG, Düsseldorf, and professional liability is governed by the General Engagement Terms for Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften (Allgemeine Auftragsbedingungen für Wirtschaftsprüfer und Wirtschaftsprüfungsgesellschaften) in the version dated January 1, 2017 (https://www.kpmg.de/bescheinigungen/lib/aab_english.pdf). By reading and using the information contained in this report, each recipient confirms notice of provisions of the General Engagement Terms (including the limitation of our liability for negligence to EUR 4 Mio as stipulated in No. 9) and accepts the validity of the General Engagement Terms with respect to us.

Frankfurt am Main, December 9, 2020

KPMG AG
Wirtschaftsprüfungsgesellschaft
[Original German version signed by:]

Glöckner
Wirtschaftsprüfer
[German Public Auditor]

Brokof
Wirtschaftsprüferin
[German Public Auditor]

IMPRINT

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