

# **EU CODE OF CONDUCT ON RESPONSIBLE FOOD BUSINESS AND MARKETING PRACTICES**

**TEMPLATE FOR COMPANIES**

**METRO AG**

**REPORT SUBMITTED ON 31.07.2025 FOR FY 2023 /2024 (01.10.2023 - 30.09.2024)**

Type of business/sector	Sustainability dimension	Code aspirational	Individual commitments with baseline	Progress on KPIs and goals (qualitative and/or quantitative)	Additional information
Wholesale	Environment	2	Reduction of food waste in own operations by 50% until end of 2025 with baseline 2017/2018	METRO produced 10.2 kg of food waste per m <sup>2</sup> of selling and delivery space, which represents an adjusted reduction of 26.9 % in FY 2023/24 against the FY 2017/18 baseline.	<p>1) In September 2019 METRO joined the 10x20x30 initiative of the World Resource Institute. Within this initiative at least 10 of the world's largest food retailers and providers follow the "Target-Measure-Act" approach, meaning that each engages 20 of their priority suppliers to do the same – thereby halving their food loss and waste by 2030. Together with participating businesses we share the mission to massively increase private sector contribution to the global goal of reducing food loss and waste by 50% by 2030 by catalyzing efforts "up" the supply chain.</p> <p>(2) In 3 countries, we are working with Too Good To Go (TGTG). The company provides a platform to sell surplus food that otherwise goes to waste in a specially branded bag (the Magic Bag) at reduced prices. It operates an app that allows food waste fighting end-consumers to buy unsold food from participating METRO stores.</p> <p>In financial year 2023/24, the dedicated collaboration has 'saved' more than 107,745 meals, which corresponds to a reduction of 290.9 tonnes of CO2.</p> <p>(3) METRO has collaborated with the 'Tafel' (food bank) movement for more than 2 decades. We are also steadily expanding the collaboration on an international scale and partner with the European Federation of Food Banks (Fédération Européenne des Banques Alimentaires, FEBA). In 25 countries and service units, we work with food bank organisations. In FY 2023/24 METRO Food Donations amount to 23,863,143.87 kg.</p>

Type of business/s ector	Sustainabi lity dimension	Code aspiration	Individual commitments with baseline	Progress on KPIs and goals (qualitative and/or quantitative)	Additional information
Wholesale	Healthy, balanced diets	1	<p>Offer of healthy and nutritious products, reformulation of own- brand products</p> <p>Reformulation here means</p> <ul style="list-style-type: none"> <li>-reduction of sugar, salt and saturated fatty acids content of 0,1g per 100g for products with a minimum content of 0,5g sugar/saturated fatty acids per 100g and 1g salt per 100g.</li> <li>-removal of all additives listed in METRO's Health &amp; Nutrition policy and additives accepted for legitimate reasons or reduction of the number of those before mentioned additives present in the recipe.</li> </ul>	<p>In FY 23/24 we had in our own brand assortment further reformulations*:</p> <ul style="list-style-type: none"> <li>-114 products less of sugar / salt / saturated fatty acids;</li> <li>-59 products free from trans fat flavor enhancer/azo food colors/preservatives/others</li> <li>-8 organic products;</li> <li>-5 alternative protein products.</li> </ul> <p>* All figures shown refer to own brand products only.A product is also counted in these figures if the product range gets extended with a product qualifying under the criteria and does not necessarily only mean a reformulation of existing products.</p>	<p>Organic products reflected in this figure refer to products from biological agriculture and meeting requirements of EU regulations (EU 834/2007, EU 889/2008 and EU 271/2010) and other applicable national organic regulations of non-EU countries.</p> <p>Alternative protein products reflected in this figure refer to alternatives of animal proteins (meat, milk, fish, eggs and their derivatives) produced using novel or new technologies and ingredients, which include: Plant-based extracts e.g. pea proteins, cell-cultures (synthetic) proteins e.g. meat grown in a lab.</p> <p>For these products a change of methodology has been introduced as of FY 2023/24: compared to previous years, alternative proteins products with higher number of additives vs. previous recipe shall not be considered as "healthier" hence not be reported; before, all alternative protein products were counted in.</p> <p>Also, the base year and way of displaying the figures changed in reporting year 2023/24 hence makes a comparison to 2022/23 data not possible: figures shown in last year's report for FY 2021/22 and 2022/23 refer to base year 2018. Figures as of FY 2023/24 refer to the new base date of 1 October 2023 and show "less of" and "free from" as two separated figures for transparency reasons.</p>

Type of business/sector	Sustainability dimension	Code aspirational	Individual commitments with baseline	Progress on KPIs and goals (qualitative and/or quantitative)	Additional information
Wholesale	Social	7	<p>(1) By end of 2030, Lost Time Injury Frequency Rate (LTIFR) of 4.85 per 1 million hours worked.</p> <p>(2) Socially compliant supply chains for all risky own brand producers by end of 2030.</p>	<p>(1) In FY 2023/24, LTIFR 6.98 per 1 million working hours.</p> <p>(2) 412 risky non-food producers audited, thereof all passed the audit (100%).</p> <p>117 risky food / near-food producers audited, thereof all passed the audit (100%).</p>	<p>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 working hours. Fatalities and cases of permanent sick leave or disability are likewise included, whereas accidents while commuting are not.</p> <p>(2) Some of our national entities work with their local producers and support them with training courses that serve to teach understanding and compliance with social standards. By training our own-brand suppliers on the implementation of fair labour conditions, we sensitise them to comply with conditions and avoid violations.</p>

Type of business/s ector	Sustainabi lity dimension	Code aspiration	Individual commitments with baseline	Progress on KPIs and goals (qualitative and/or quantitative)	Additional information
Wholesale	Sustainable sourcing	7	<p>(1) Palm oil: 100% of own brand products containing palm oil being RSPO Identity Preserved or Segregated certified by end of 2023.</p> <p>(2) Sustainable fished or farmed products: 90% of our TOP 12 own brand and no name fish and seafood species environmentally certified by end of 2025, 100% socially certified by end of 2025 and 100% digitally traceable by end of 2030.</p> <p>(3) Cage free eggs: All own brand shell eggs 100% cage-free in Western and Southern Europe by the end of 2022. In Eastern Europe (EU) by the end of 2025 and in remaining markets until end of 2027.</p> <p>(4) Products from sustainable forestry: 100% of own brand products containing more than 50% of wood in weight from sustainable forestry* by end of 2023.</p> <p>*Sustainable forestry means certified against FSC® or PEFC label or from recycled material.</p>	<p>(1) In FY 2023/24 35% of METRO Own Brand products have certified palm oil products. Also:</p> <p>In volume, 80% palm oil used in our METRO own brand products as RSPO certified.</p> <p>(2) In FY 2023/24 71% of certified own brand fish and seafood products.</p> <p>(3) In FY 2023/24, 55% of own brands are cage free shell egg products</p> <p>(4) In FY 2023/24 66% of own products are from sustainable forestry.</p>	<p>For more details on METRO sourcing policies and results, please see <a href="https://responsibility.metroag.de/esg-priorities/ethics-and-trust/sustainable-sourcing-and-products">https://responsibility.metroag.de/esg-priorities/ethics-and-trust/sustainable-sourcing-and-products</a></p> <p>and</p> <p><a href="https://responsibility.metroag.de/commitments/kpis-and-targets/organic-and-responsible-products">https://responsibility.metroag.de/commitments/kpis-and-targets/organic-and-responsible-products</a></p> <p>Considering the new EU Deforestation Regulation METRO currently revises its Sustainable Palm Oil and Paper &amp; Wood Policies and therefore has not renewed its targets.</p> <p>(3) Referring to own brand cage free shell eggs products, an improvement of farming conditions for laying hens by promoting alternative and more sustainable housing systems, i.e., barn systems and outdoor access systems (free range, organic – ‘enriched’ or ‘combi’ cage systems not allowed).</p> <p>We have successfully transitioned to exclusively use 100% cage free shell eggs for our own brand assortment already last year in multiple countries (Austria, Germany, Italy, Netherlands, Poland). In 2023/24 two additional countries France and Turkey reached their 100% target.</p> <p>(4) Sustainable forestry means certified according to FSC® or PEFC label or from recycled material. Brand data is not available as reporting system currently cannot discriminate product certificate vs. packaging certificate on sustainable forestry.</p>

Type of business/sector	Sustainability dimension	Code aspirational	Individual commitments with baseline	Progress on KPIs and goals (qualitative and/or quantitative)	Additional information
Wholesale	Environment	3	Reduction of scope 1 and 2 of CO2 emission by 60% per m2 of selling and delivery space by 2030 compared to 2011 (Science-based target). METRO submitted SBTi targets as early as in 2019, they are currently being revised. This process takes account of the new provisions of the CSRD. Climate neutrality: We aim to be climate-neutral by 2040 mainly through own investments. In reporting period 2021/22, we expanded our 2040 climate protection target to include emissions from our own logistics fleet (FoV). Due to this expansion, the methodology for determining the CO2 equivalents per m2 of selling, office and delivery space was adjusted and the key figures for the base year and the previous year's values were corrected accordingly.	In FY 2023/24, compared to the base year 2011 the Scope 1-3 CO2 emissions have been reduced by 51.9% per m2 of selling and delivery space. Total figure is 186 kg of CO2 equivalents per m2 of selling and delivery space.	<p>In the base year 2011 specific greenhouse gas emissions were 382 kg CO2/m2 of selling and delivery space.</p> <p>The significant decline in emissions to 186kg CO2/m2 of selling, office and delivery space in the reporting period 2023/24 compared with the reference year 2011 can essentially be attributed to measures to reduce consumption relating to energy, paper and business travel, and to reduce emissions caused by refrigerant loss, as well as investments in green electricity and digitization.</p> <p>In addition to its climate protection target, in financial year 2018/19, METRO expanded its climate efforts to the supply chain and as the first German retailer set a recognized Science Based Target (SBTi) for itself. As part of the SBTi, METRO undertakes to reduce its Scope-1- and Scope-2-CO2 emissions by 60% per square meter selling, office and delivery space by 2030 compared to 2011. In addition, as part of SBTi, METRO is committed to reducing absolute Scope 3 CO2 emissions (supply chain) by 15% by 2030 compared to 2018.</p>