



**OUR BUSINESS
PRINCIPLES**

OUR COMMITMENT

Compliance is not an end in itself: Lawful, honest and responsible action serves our customers, the employees and ultimately our company.




Simply right

Compliance is, above all, a question of good corporate culture. We can create that culture only if we work together.

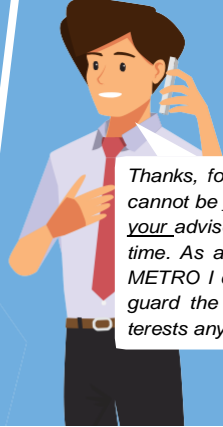
Our compliance values and the METRO business principles help us in our day-to-day business

- » to safeguard the interests of our customers and METRO,
- » to be an attractive employer and
- » to protect the company and its employees from harm.

Our business principles are an important part of our compliance culture. Compliance with our business principles is part of our DNA and our promise also towards our customers. Acting against our business principles will not be tolerated by our community or by our company.



...OK, we will supply the goods by Wednesday. By the way, we are looking for someone with experience in wholesale or retail who can advise us. Would you be interested?



Thanks, for asking. But I cannot be your client and your adviser at the same time. As an employee of METRO I could not safeguard the company's interests anymore.



I

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

Working for METRO means we represent METRO and its interests. Personal and professional matters must always be strictly separated. METRO needs your undivided loyalty and your dedicated commitment for the benefit of our customers. There is no place for conflicts of interest. In cases of doubt, we ask our superior or compliance officer.

Do you happen to know whether the head of the municipal building authority likes to go to concerts? We will need a construction permit soon and could maybe ...

Stop! We will not do that. That would be illegal!




2

We do not offer anyone an advantage that cannot be justified.

The following applies at all times when dealing with business partners and authorities: We do not offer any unjustified benefits and we avoid even the appearance of bribery. What we offer is fair and based on performance. We comply strictly with the law, particularly when dealing with authorities. If we want to offer a benefit that could be seen as unjustified, we first consult our superior or compliance officer.

What is acceptable?

- » Symbolic gifts and gifts that are low in value.
- » Invitations by business partners to business lunches and dinners in a reasonable setting.
- » And of course: aggressive price competition and convincing product offers and services to our customers.



I could get you a set of new tyres for your car free of charge if you award us the contract.

That is bribery. We don't want to get involved with such methods!

3

We do not use our position to our personal advantage.

We collaborate with thousands of business partners. It is important that we do not request or accept any personal benefits when selecting business partners. During the selection process, we focus instead on the best interests of our customers and of the company. We also avoid any acts that could be misunderstood as bribery. In case of doubt, we ask our compliance officer.

What is acceptable?

- » Invitations to business-related events such as a product launch.
- » Symbolic gifts and gifts that are low in value.
- » Invitations to business lunches and dinners in a reasonable setting.




4

We treat all information from the company as confidential.

A lot of information that helps us to make the best possible offer to our customers is confidential. We are always careful with whom and where we share information so that confidential information does not get into the wrong hands.

We do not disclose any information or documents from the company to third parties outside of our normal business processes. We forward enquiries to the responsible colleagues at METRO.

Information that has been published or publicly confirmed by METRO is of course not confidential.



Listen, I suggest that you don't go below the RRP of the supplier in the next promotion, and in return, we won't do that either. Deal?

That is an illegal agreement! Not with me!

5

We respect the rules of fair competition.

Competition drives us to make the best possible offers to our customers. That is why we strictly abide by antitrust law. In practice, this means: We do not speak to competitors about confidential matters that are commercially sensitive, such as purchasing and resale prices, costs and customers. We do not agree on resale prices with suppliers. We do not obtain any information about specific competitors from suppliers.

*Finally, a male candidate.
We should recruit him!*

*I understand that you would get
on well with him. But Ms. Müller is
considerably more qualified. We
have to stay objective here!*



6

We treat everyone as equals.

Discrimination is not acceptable. At METRO, we treat everybody with respect and protect employees against any form of discrimination, especially based on their origin, religion, ethnic group, age, sexual orientation and identity, their gender or a disability. There is no place in our group for any form of harassment such as bullying or sexual harassment.

Is it correct that we are not allowed to take any holiday this year?



No, that is not correct. After all, there is a right to take days off. We will stick to that.

7

We are a fair employer.

Our employees are important to us! That is why we create and maintain fair working conditions. This means of course that we comply with regulations under labor law. It also means that as a company we respect the national laws where we operate. For instance, employees can unionize pursuant to national laws, if they wish to do so.

Look, some of the mandatory information is missing on this product label. But nobody will notice ...

Wrong – we have to change the labels immediately!



8

We respect all legal provisions and regulations.

It sounds simple but it is very important: We always work in compliance with laws and company guidelines. Personal responsibility and dedication are required. This means that we inform ourselves about important legal provisions, keep ourselves updated on company guidelines and take part in training courses. In case of doubt, we ask our compliance officer.



My contact persons

We are here to support you.

With the 8 METRO business principles it is easy to act in compliance with our values and rules. Nevertheless, questions may arise: How do I apply a business principle in a specific instance? How can I point something out?

We promote a culture of **trust, openness and transparency**. Only if METRO knows about what is going wrong will it be able to address the situation.

For this, please contact your **superior** or the local **compliance officer** of your entity.

For more information please visit **UNITED**.



Speak up!

You can rely on us.

There may be cases in which it is important to speak about the matter outside your direct environment.

In this case please go to www.metroag.de/compliance and leave a report. This can also be done entirely anonymous from a public computer.

Every single report will be investigated appropriately. The whistleblower will not face any negative consequences for submitting a report in good faith. What's more: We also protect affected colleagues against unjustified accusations.

There is a structured and transparent procedure for handling all relevant cases. A committee, consisting of representatives from the compliance, HR, law and audit functions safeguards that each report is treated fairly and is processed consistently.