Particulars

About Your Organisation

1.1 Member Name

METRO AG

1.2 Membership number

3-0038-11-000-00

1.3 Membership sector

Retailers

1.4 Membership category

Ordinary

1.5 Country

Germany

2.0 Does your company or organisation produce, process, consume or sell any palm oil or any products containing derivatives of palm oil?

Yes

2.1 Please select all description(s) that describe the palm oil-related activities of your company or organisation. Multiple selections are allowed, and not limited to the primary sector of the member's RSPO membership. You will be required to complete the relevant ACOP section based on your selection(s).

- [ ] I own and operate oil palm estate(s) and/or palm oil mill(s)
- [ ] I represent a palm oil Independent Smallholder farmer Group
- [ ] I own and operate independent palm oil mills
- [ ] I own and operate independent palm kernel crushing plants
- [ ] I trade or broker palm oil, palm kernel oil or related products
- [ ] I am a refiner of palm oil or palm kernel oil
- [ ] I am a processor of intermediate (B2B) palm oil, palm kernel oil or related ingredients
- [ ] I am a B2B distributor or wholesaler of palm oil, palm kernel oil or related products
- [ ] I manufacture consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by 3rd party contractors.
  - [x] I retail consumer (B2C) products containing palm oil, palm kernel oil or related products
- [ ] I operate food retail outlets that use palm oil, palm kernel oil or related products
- [ ] I support the sustainable development of the palm oil industry as a conservation and environmental NGO
- [ ] I support the sustainable development of the palm oil industry as a social and human development NGO
Retailers

1. Operational Profile

1.1 Please state your company's main activity(ies) within the palm oil supply chain. Please select all options that apply to your operations.

- Retail - with own brand products
- Retail - without own brand products
- Food service providers
- Retail wholesalers
- Other

2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Consumption - is a mandatory declaration in your ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the RSPO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports without reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports may lead to suspension or termination of RSPO membership.

2.1 Please list down all operations and subsidiaries using palm oil, palm kernel oil and related products that are owned and/or managed by the member, including those under Group Membership

METRO Cash & Carry Romania, METRO Cash & Carry Slovakia, METRO Cash & Carry Kazakhstan, METRO Cash & Carry Ukraine, METRO Jinjiang Cash & Carry, METRO Cash & Carry Deutschland, METRO Cash & Carry France, METRO Cash & Carry India, METRO Cash & Carry Japan, METRO Cash & Carry Russia, METRO Cash & Carry Türkiye, METRO Cash & Carry Bulgara, METRO Cash & Carry Österreich, METRO Cash & Carry Croatia, METRO Cash & Carry Serbiya, METRO Italia Cash & Carry, Makro Cash & Carry Polska, Makro Cash & Carry España, Makro Cash & Carry Czech, Makro Cash & Carry Belgium, METRO Cash & Carry Pakistan, METRO Cash & Carry Moldova, METRO Cash & Carry Portugal, METRO Cash & Carry Hungary, Makro Cash & Carry Netherlands

2.1.1 In which markets does your company sell goods with palm oil and oil palm products?

Europe, India, Rest of the World

DL.2.0 In order to facilitate ease of reporting and transparency, RSPO members operating within the palm oil demand supply chain can now choose to report palm oil and palm oil product volumes on:

an aggregate level (as in previous ACOP reporting cycles)
2.2 Total volume of uncertified and certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand and third-party brand products

<table>
<thead>
<tr>
<th>Description</th>
<th>Tonnes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total volume of crude palm oil (tonnes)</td>
<td>11983.8</td>
</tr>
<tr>
<td>Total volume of crude palm kernel oil (tonnes)</td>
<td>108.58</td>
</tr>
<tr>
<td>Total volume of palm kernel expeller (tonnes)</td>
<td>0.0</td>
</tr>
<tr>
<td>Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)</td>
<td>0.0</td>
</tr>
<tr>
<td>Total</td>
<td>12092</td>
</tr>
</tbody>
</table>

2.2.1 Please estimate the percentage of derivatives and fractions (reported in Question RT.2.2) derived from palm oil or from palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based derivatives.

<table>
<thead>
<tr>
<th>Description</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Palm oil-based derivatives and fractions</td>
<td>-</td>
</tr>
<tr>
<td>Palm kernel oil-based derivatives and fractions</td>
<td>-</td>
</tr>
</tbody>
</table>

2.3 Please estimate the regional distribution of your company's uncertified and certified palm oil, palm kernel oil and related products sales (as declared in Question 2.2) in the following countries/regions. In cases where sales distribution data is not available, members may use manufacturing regions as a proxy for regional usage of certified volumes.

<table>
<thead>
<tr>
<th>Countries/Regions</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Europe</td>
<td>50.0</td>
</tr>
<tr>
<td>North America</td>
<td>0.0</td>
</tr>
<tr>
<td>Malaysia</td>
<td>0.0</td>
</tr>
<tr>
<td>Indonesia</td>
<td>0.0</td>
</tr>
<tr>
<td>China</td>
<td>0.0</td>
</tr>
<tr>
<td>India</td>
<td>10.0</td>
</tr>
<tr>
<td>Latin America</td>
<td>0.0</td>
</tr>
<tr>
<td>Africa</td>
<td>0.0</td>
</tr>
<tr>
<td>Rest of World</td>
<td>40.0</td>
</tr>
</tbody>
</table>
2.4 Total volume of RSPO-certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand products. Third-party brand products containing palm oil should be excluded.

<table>
<thead>
<tr>
<th>Description</th>
<th>Crude/Refined Palm Oil (CSPO)</th>
<th>Crude/Refined Palm Kernel Oil (CSPKO)</th>
<th>Palm Kernel Expeller (CSPKE)</th>
<th>Certified Derivatives and Fractions</th>
</tr>
</thead>
<tbody>
<tr>
<td>RSPO Credits from Mill / Crusher</td>
<td>4001.18</td>
<td>71.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>RSPO Credits from Independent Smallholder</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Mass Balance (MB)</td>
<td>3479.09</td>
<td>37.16</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Segregated (SG)</td>
<td>4416.15</td>
<td>0.34</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Identity Preserved (IP)</td>
<td>87.38</td>
<td>0.08</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Total</td>
<td>11983.8</td>
<td>108.58</td>
<td>0.0</td>
<td>0.0</td>
</tr>
</tbody>
</table>

2.4.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question RT.2.4) derived from RSPO-certified palm oil or from RSPO-certified palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based

<table>
<thead>
<tr>
<th>Description</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certified Palm oil-based derivatives and fractions</td>
<td>-</td>
</tr>
<tr>
<td>Certified Palm kernel oil-based derivatives and fractions</td>
<td>-</td>
</tr>
</tbody>
</table>

2.5 According to the volume information you have provided in Question 2.2 and Question 2.4, your company's Certified Sustainable Palm Oil uptake is: 100.00%

2.5.1 Please provide additional information on your certified palm oil, palm kernel oil and related products uptake. This may include your usage of RSPO Credits to cover gaps in certified uptake, changes due to business environment, variations due to stock positions or efforts to support independent smallholders beyond volume commitments.

In 2020, METRO AG as the holding company decided to cover the gap of aggregated non-certified palm oil volume by centrally buying Book & Claim credits. For this, CSPO and CPKO credits were purchased via the PalmTrace plattform. These were claimed for 2020 and included in the calculation above.
2.6 Please estimate the regional distribution of your company's RSPO certified palm oil and palm oil-products usage (as declared in Question RT.2.3) in the following countries/regions:

<table>
<thead>
<tr>
<th>Countries/Regions</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Europe</td>
<td>71.0</td>
</tr>
<tr>
<td>North America</td>
<td>0.0</td>
</tr>
<tr>
<td>Malaysia</td>
<td>0.0</td>
</tr>
<tr>
<td>Indonesia</td>
<td>0.0</td>
</tr>
<tr>
<td>China</td>
<td>0.0</td>
</tr>
<tr>
<td>India</td>
<td>16.0</td>
</tr>
<tr>
<td>Latin America</td>
<td>0.0</td>
</tr>
<tr>
<td>Africa</td>
<td>0.0</td>
</tr>
<tr>
<td>Rest of World</td>
<td>13.0</td>
</tr>
</tbody>
</table>
3. TimeBound Plan

3.1 Which year did your company begin (or expects to begin) using RSPO-certified sustainable palm oil and palm oil products in own-brand products

2012

3.1.1 If the previous target year has not been met, please explain why.

The target of starting in 2012 was the first target, so no previous target existed.

3.2 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil, palm kernel oil and related products from any supply chain option in own-brand products.

2020

3.2.1 If the previous target year has not been met, please explain why.

Minimum 100% Mass Balance was expected in 2015. Due to product categories such as derivatives, fractions or geographical availability (esp. China, India, Pakistan) that target was prolonged to 2020.

3.3 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil and palm oil products from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in own-brand products.

2020

3.3.1 If the previous target year has not been met, please explain why.

The target has been met by covering a gap with Book & Claim credits.

3.4 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why

It does cover all countries of operation for METRO Cash & Carry / METRO Wholesale
4. Trademark Use

4.1 Does your company use or plan to use the RSPO Trademark in own-brand products?

Yes

4.2 Please select the countries where your company uses or intends to use the Trademark

Applies globally

4.2.1 Which year did your company begin (or expects to begin) using the RSPO Trademark

2012
5. Actions for Next Reporting Period

5.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)

The target is to increase the global uptake of Segregated or Identity Preserved CSPO by 2023. For this, the internal governance structure at METRO has been enhanced with a stronger support to focus on RSPO product certification throughout all METRO business areas and geographies.
Shared Responsibility

The Board of Governors of the Roundtable on Sustainable Palm Oil approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility indicators will be done through several channels, including ACOP. As the implementation of Shared Responsibility reporting is still on-going and in development, the Shared Responsibility section in ACOP is not yet final and may change in future ACOP cycles. For more information on Shared Responsibility, please go to https://rspo.org/news-and-events/news/what-are-the-new-shared-responsibility-rules or email the ACOP team at acop@rspo.org

Labour & Labour Rights

1.1 Does your company have a publicly-available policy covering Labour & Labour Rights?

Yes

1.1.1 Does the policy cover:

- ✔ No discrimination
- ✔ Wage and working conditions
- ✔ Freedom of association
- ✔ No child labour
- ✔ No harassment
- ✔ No forced or trafficked labour

Ethical Conduct & Human Rights

1.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?

Yes

1.2.1 Does the policy cover:

- ✔ Recruitment
- ✔ Contractors
- ✔ Sub-Contractors & Third-Party Contractors

Land Use

1.3 Does your company have a publicly-available Policy covering Land Use?

No

Occupational Health & Safety

1.4 Does your company have a publicly-available Policy covering Occupational Health & Safety?

Yes
Climate Change & Greenhouse Gas (GHG)

1.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?

Yes

1.5.1 Does the policy cover:

- Identification and assessment of GHG
- Monitored implementation plan to reduce or minimise GHG emissions

Complaints & Grievances

1.6 Does your company have a Complaints & Grievances Mechanism?

Yes

1.6.1 Is your Complaints & Grievance mechanism in line with the principles of the RSPO's grievance mechanism, which are the elements of fairness, transparency, and impartiality?

Yes

Smallholders

1.7 Does your company support oil palm independent smallholder groups?

No

1.7.3 Do you have any future plans to support oil palm independent Smallholders?

Yes
Sustainable Palm Oil Policy

1.8 Does your company have a publicly-available Policy covering the implementation of RSPO Shared Responsibility principles?

Yes

Waste Management

1.9 Does your company have a waste management plan?

Yes

Water Management

1.10 Does your company have a water management plan?

Yes

Energy Use

1.11 Does your company have an energy use plan covering fossil fuels and renewable energy?

Yes

RSPO Services and Support

1.12 Does your company provide services and support to the RSPO, eg. participation in RSPO Working Groups and Task Forces

Yes

Shared Responsibility Resourcing

1.13 Does your company have a plan to commit resources to ensure effective implementation of RSPO Shared Responsibility principles?

Yes
Challenges and Support

1.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?

- Awareness of RSPO in the market
- Difficulties in the certification process
- Certification of smallholders
- Competition with non-RSPO members
- High costs in achieving or adhering to certification
- Human rights issues
- Insufficient demand for RSPO-certified palm oil
- Low usage of palm oil
- Reputation of palm oil in the market
- Reputation of RSPO in the market
- Supply issues
- Traceability issues
- No challenges faced
- Others

Others

METRO faced weak market demand in some geographies, such as Eastern Europe or India and Pakistan. The awareness of palm oil as such and the RSPO is very low. Also, price levels especially for food products, are very low and competitive. Hence, customers are not always willing to invest into RSPO certified products. In other markets, we observe a negative reputation of palm oil. This leads to manufacturers switching to other (exotic) oils to substitute palm oil. We do not generally support this as this might push other environmental & social risks.
1.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?

- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
- Promotion of physical CSPO
- Providing funding or support for CSPO development efforts
- Research & Development support
- Stakeholder engagement
- No actions taken
- Others

Others

METRO is working actively on the implementation of its Palm Oil Procurement Policy together with different stakeholders within the value chain. METRO also encourages its METRO Wholesale country-based business operations to partner with nationally relevant stakeholders.

METRO Wholesale (METRO) is committed to promoting sustainable palm oil production and continuously seeks to optimise the procurement process in order to ensure that it only purchases products containing palm oil derived from legal and more sustainable sources. METRO is committed to the sustainable use of palm oil resources in environmental, social and economic terms.

1.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here

https://responsibility.metroag.de/focus-areas/raw-material-sourcing
https://responsibility.metroag.de/commitments/kpis-and-targets/organic-and-responsible-products