Particulars

About Your O	rganisation
1.1 Member Na	ame
METRO AG	
1.2 Membershi	ip Number
3-0038-11-000-	.00
1.3 Membershi	ip Sector
Retailers	
1.4 Membershi	ip Category
Ordinary	
1.5 Country	
Germany	
2.0 Does your of derivatives of p	company or organisation produce, process, consume or sell any palm oil or any products containing palm oil?
Yes	
Multiple select	et all description(s) that describe the palm oil-related activities of your company or organisation. ions are allowed, and not limited to the primary sector of the member's RSPO membership. You d to complete the relevant ACOP section based on your selection(s).
I own and ope	erate oil palm estate(s) and/or palm oil mill(s)
I represent a p	palm oil Independent Smallholder farmer Group
I own and ope	erate independent palm oil mills
I own and ope	erate independent palm kernel crushing plants - Processors and/or Traders
I trade or brok	xer palm oil, palm kernel oil or related products - Processors and/or Traders
	of palm oil or palm kernel oil - Processors and/or Traders
_	sor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders
	istributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders
I manufacture 3rd party cont	final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by ractors - Consumer Goods Manufacturers
✓ I retail final co	onsumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers
☐ I operate food	retail outlets that use palm oil, palm kernel oil or related products - Retailers
I am a conserv	vation and environmental NGO supporting the sustainable development of the palm oil industry
I am a social a	and human development NGO supporting the sustainable development of the nalm oil industry

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Retailers

1. Operational Profile		
	Please state your company's main activity(ies) within the palm oil supply chain. Please select all options that ly to your operations.	
\mathbf{Y}	Retail - with own brand products	
	Retail - without own brand products	
	Food service providers	
\mathbf{V}	Retail wholesalers	
	Other	
Oth	er	
0 111		
	lm Oil and Certified Sustainable Palm Oil Consumption	
in y RSI with	ormation in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Consumption - is a mandatory declaration our ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the PO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports nout reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports y lead to suspension or termination of RSPO membership.	
in y RSI with may 2.1	our ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the PO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports to	
in y RSI with may 2.1 own ME Car ME Bull Italia	our ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the PO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports nout reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports when lead to suspension or termination of RSPO membership. Please list down all operations and subsidiaries using palm oil, palm kernel oil and related products that are need and/or managed by the member, including those under Group Membership	
ME Car ME Bul Itali & C	our ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the PO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports to the temporal volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports a lead to suspension or termination of RSPO membership. Please list down all operations and subsidiaries using palm oil, palm kernel oil and related products that are need and/or managed by the member, including those under Group Membership TRO Cash & Carry Romania, METRO Cash & Carry Slovakia, METRO Cash & Carry Kazakhstan, METRO Cash & ry Ukraine, METRO Cash & Carry Deutschland, METRO Cash & Carry France, METRO Cash & Carry India, TRO Cash & Carry Japan, METRO Cash & Carry Russia, METRO Cash & Carry Türkiye, METRO Cash & Carry garia, METRO Cash & Carry Österreich, METRO Cash & Carry Croatia, METRO Cash & Carry Serbia, METRO ia Cash & Carry, Makro Cash & Carry Polska, Makro Cash & Carry Spain, Makro Cash & Carry Czech, Makro Cash Carry Belgium, METRO Cash & Carry Portugal,	

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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 products. Third-party brand products containing palm oil should be excluded.

Description	Tonnes
Total volume of crude palm oil (tonnes)	39407.03
Total volume of crude palm kernel oil (tonnes)	311.21
Total volume of palm kernel expeller (tonnes)	0.00
Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)	0.00
Total	39718.24

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.

Description	Percentage
Palm oil-based derivatives and fractions	0
Palm kernel oil-based derivatives and fractions	0

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.

Percentage
80
0
0
0
0
5
0
0
15

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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.

Description	Crude/Refined Palm Oil (CSPO)	Crude/Refined Palm Kernel Oil (CSPKO)	Palm Kernel Expeller (CSPKE)	Certified Derivatives and Fractions
RSPO Credits from Mill / Crusher	795.11	11.54	0.00	0.00
RSPO Credits from Independent Smallholder	0.00	0.00	0.00	0.00
Mass Balance (MB)	5357.65	171.06	0.00	0.00
Segregated (SG)	20872.68	2.27	0.00	0.00
Identity Preserved (IP)	10.11	0.00	0.00	0.00
Total	27035.55	184.87	0.00	0.00

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

Description	Percentage
Certified Palm oil-based derivatives and fractions	0
Certified Palm kernel oil-based derivatives and fractions	0

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:

68.53%

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.

The target is to increase the global uptake of Segregated or Identity Preserved CSPO.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. In those challenging product categories, such as detergents (with palm oil derivatives or just a small amount) credits are being considered as a first step into certification.

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 $2.6\ Please\ estimate\ the\ regional\ distribution\ of\ your\ company's\ RSPO\ certified\ palm\ oil,\ palm\ kernel\ oil\ and\ related\ products\ (as\ declared\ in\ Question\ RT.2.4)\ in\ the\ following\ countries/regions:$

Countries/Regions	Percentage
Europe	95
North America	0
Malaysia	0
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	5

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3. TimeBound Plan

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4	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

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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)		
	Participation in RSPO Working Group or Task Forces	
	Support Independent Smallholders (ISH)	
	Contribute to the RSPO Smallholder Trainer Academy	
	Financial contribution to the RSPO Smallholder Support Fund	
	Direct investments in Smallholder Certification projects	
	Involvement/direct investments in Jurisdictional/Landscape approach	
	Direct/collective investments in conservation and restoration initiatives	
	Financial contribution to support members with Remediation and Compensation (RaCP) process, direct/collective investments in conservation and restoration initiatives	
	Allocating FTE to promote the production or consumption of certified sustainable oil palm products	
Y	Specific policies and action plans by the member to promote CSPO production or consumption in the upstream or downstream supply chain, including target dates or broader policies that include such efforts	
	No activities planned	
Y	Others	
Otl	ner	
gov	e target is to increase the global uptake of Segregated or Identity Preserved CSPO by 2023. For this, the internal vernance structure at METRO has been enhanced with a stronger support to focus on RSPO product certification oughout all METRO business areas and geographies.	

Moreover, supplier engagement within challenging markets such as India and Pakistan has been started with the support of RSPO, and also in product categories which is more challenging due to small percentage of Palm Oil or derivatives.

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Yes

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 (SR) requirements will be done through ACOP and MyRSPO. As the process of verification of the reports is in development, the Shared Responsibility section in ACOP may change in future ACOP cycles. Evidence to show compliance to the SR requirements shall be uploaded via your membership profile in MyRSPO. Please login to your MyRSPO account and upload the relevant policies, plans and relevant reports there. If you do not have a policy or your policy does not cover all items, you will be required to provide a Declaration of Support for the relevant policy items in your MyRSPO profile. Additional information on the required policies and plans applicable to all sectors as well as the annual uptake targets for supply chain actors can be found on https://rspo.org/members/shared-responsibility or email the Shared Responsibility team at sharedresponsibility@rspo.org.

Information & Public Availability 1.1 Does your company have organisational management documents publicly-available? Yes **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: **M** Recruitment Contractors ✓ Suppliers and Sub-Contractors Legal Compliance 1.3 Does your company comply with all applicable legal requirements? Yes 1.4 Does your company require its third party contractors to comply with legal requirements, i.e. including a clause on legal compliance in the contracts? Yes Complaints & Grievances 1.5 Does your company have a Grievance Mechanism that is accessible to all affected parties? Yes 1.5.1 Is your Grievance mechanism in line with the principles of the RSPO's Complaints System?

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Land Use & FPIC

1.6 Does your company have a publicly-available policy covering Commitment to respect Free Prior and Informed Consent (FPIC) in the Palm Oil Supply chain?
No
Smallholders
1.7 Does your company support oil palm smallholders (groups)?
Yes
1.7.1 Does your company report on the actions to support the inclusion of smallholders?
Yes
Labour & Labour Rights
1.8 Does your company have a publicly-available policy covering Labour & Labour Rights?
Yes
1.8.1 Does the policy cover:
✓ No discrimination and equal opportunities
Pay and working conditions at least at legal or industry minimum standards and are sufficient to provide decent living wages (DLW)
▼ Freedom of association and Collective bargaining
✓ Protection of children, as well as the workforce of suppliers and third-party contractors
Prevention of all forms of harassment, including sexual harassment
✓ No forced or trafficked labour
Occupational Health & Safety
1.9 Does your company have a publicly-available Policy covering Occupational Health & Safety?
Yes
1.9.1 Does your company have a Standard Operating Procedure (SOP) for Occupational Health & Safety?
Yes

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Waste Management

1.10a Does your company have a waste management plan that includes reduction, recycling, reusing and disposal based on the hazardous characteristics?
Yes
1.10a.1 Is this plan implemented?
Yes
Water Management
1.11 Does your company have a water management plan to promote efficient use and continued availability of water sources?
Yes
1.11.1 Is this plan implemented?
Yes
Energy Use
1.12 Does your company have an energy use plan to improve the efficiency of the fossil fuels used and to optimise renewable energy?
Yes
1.12.1 Are there records of implementation of the plan ie. monitoring and reporting?
Yes
Climate Change & Greenhouse Gas (GHG)
1.13 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG) including identification and assessment of GHG emissions and implementation of a plan to reduce or minimise them?
Yes

Shared Responsibility Page 3/3

Others

Challenges and Support

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	

1.1 What significant obstacles or challenges has your company encountered in the promotion of certified

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 and suppliers 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.

We do see challenges in product categories in which palm is an ingredient in a low percentage or a derivative is present in the recipe, for example detergents. We have started conversations with our major own brand suppliers.

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environmental, social and economic terms.

the vision of the RSPO to transform markets to make sustainable palm oil the norm?
Communication and/or engagement to transform the negative perception of palm oil
☑ Engagement with business partners or consumers on the use of CSPO
☐ Engagement with government agencies
☐ Engagement with peers and clients
Promotion of CSPO through off product claims
✓ 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

Challenges & Support Page 2/3

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 (Policy, and CGF Reporting, in which we mention our Landscape work)

https://responsibility.metroag.de/commitments/kpis-and-targets/organic-and-responsible-products

Human Rights https://responsibility.metroag.de/focus-areas/human-rights/

 $https://responsibility.metroag.de/\sim/assets/common-newsroom/documents/responsibility/metro-approach-human-rights-risk-assessment_en.pdf$

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