

***SUPPLIER
CODE OF CONDUCT
for responsible
procurement***

Update
October 2025

metro

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1. Introduction

Metro Inc. and its subsidiaries (METRO) are determined to carry out their activities lawfully and ethically by adopting responsible social and environmental practices. METRO’s supply chain is a critical component of the company’s business life and plays a key role in its success.

In an effort to constantly improve its performance in terms of corporate responsibility, METRO actively seeks to conduct business with suppliers that share the company’s commitment and proactively integrate responsible practices into their activities. METRO implements its responsible procurement approach as part of a continuous improvement strategy and aims to collaborate with suppliers within a framework of transparency to adopt ethical and respectful business practices.

2. Scope

This Supplier Code of Conduct for responsible procurement (Code of Conduct) is aimed at all METRO suppliers of goods and services.

Under this Code of Conduct, the term *supplier* refers to METRO’s direct suppliers as well as their own suppliers across the supply chain.

METRO reserves the right to amend this Code of Conduct at any time. This document was originally adopted in February 2017, then updated in January 2022 and September 2025.

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3. Principles

This Code of Conduct is based on rules of conduct, commercial practices and METRO's comprehensive corporate responsibility approach.

METRO recognizes that its suppliers must conduct their business according to their objectives and corporate values and the local legislative framework, and that the attainment and upholding of responsible procurement standards constitute an ongoing long-term commitment.

Still, METRO expects all suppliers to:

- Take every measure to adopt behaviours and practices that are in line with the principles set out in this Code of Conduct;
- Be in a position to demonstrate the ways in which they apply the principles of the Code of Conduct.

The principles set out in the Code of Conduct will be applied in a targeted manner based on the specific issues associated with the different types of products and services purchased by METRO. These principles are in addition to the METRO product and service selection criteria (e.g. price, quality, availability) that are already in effect.

3.1 Business Ethics

METRO expects suppliers to manage their commercial operations according to the most stringent standards of ethical business, integrity and equity. METRO suppliers must therefore:

- Comply with all applicable laws, regulations and guidelines;
- Refrain from engaging in any form of corrupt practices, including extortion and fraud;
- Ensure the protection of the confidential and personal information they receive from METRO and only use this information as part of their business relations with METRO;
- Comply with intellectual property rights relating to the products and services they provide to METRO;
- Ensure that the use of artificial intelligence and digital technologies respects ethical principles, including transparency, confidentiality and respect for the rights of others;
- Never place a METRO employee in a situation that could compromise their ethical behaviour, integrity or create a conflict of interest;

- Divulge all actual and potential conflict of interest to METRO;
- Disclose to METRO any behaviour deemed unethical on the part of a METRO employee;
- Adopt responsible communication and advertising practices, refraining from any false or misleading representations, in particular regarding the environmental characteristics or the provenance of their products, services or activities.

3.2 Respect for workers

This principle of the Code of Conduct covers all the workers in METRO's supply chain, regardless of their status (seasonal, casual, part-time, full-time; locals or migrants). Particular emphasis is placed on the work conditions of more vulnerable workers, including migrant workers.

METRO expects its suppliers to provide products and services that are the result of practices that ensure workers are treated with dignity, respect, and equity in a healthy and safe work environment that provides decent conditions and is free from abuse.

At minimum, METRO requires that suppliers comply with the labour laws and regulations that apply in the jurisdiction in which it operates. Still, it is recognized that certain jurisdictions that supply the company with products and services do not have such laws or that there are gaps in existing laws and their enforcement. In light of this situation, METRO considers it important to guide its suppliers' practices to ensure respect for workers in its supply chain.

In order to do so, METRO looks to recognized international standards, specific labour rights and principles such as those set out by the International Labour Organization (ILO), the United Nations Guiding Principles on Business and Human Rights, the SA8000 standard of Social Accountability International and the Dhaka Principles for migration with dignity.

METRO expects suppliers to adhere to the following standards and principles.

Child labour

METRO expects suppliers not to rely on child labour and to eliminate all forms of child exploitation. The term *child* refers to any person under the age of 16. However, should local

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legislation establish a minimum age between 14 and 16 years old, this minimum age shall be accepted, especially in the agricultural sector where it is a common practice.

Workers under the age of 18 must be provided with age-appropriate schedules, working conditions and benefits that do not compromise their full physical, mental and emotional development. For example, they should not work the night shift nor perform dangerous tasks such as lifting heavy loads, handling chemicals or dangerous equipment, or working at heights or in confined spaces. METRO expects its suppliers who employ young workers to closely monitor their tasks and the conditions in which they are performed.

Forced and compulsory labour

METRO expects suppliers to refrain from relying on forced or compulsory labor, including human trafficking, sexual slavery, debt bondage, or any other form of forced labour. Employees shall not work under any threat of penalty or punishment. All tasks must be undertaken out of the employees' own free will. No worker shall be subject to abusive working conditions, such as isolation or confiscation of personal property, or be forced into sexual activity. In addition, employees must be able to leave the workplace at the end of their shift, keep their identity documents and work permits in their possession and leave their position after providing reasonable notice.

Recruitment fees

METRO expects suppliers to adhere to the "employer pays" principle, according to which employers should bear the costs of recruitment, not workers. These fees may include, but are not limited to, travel expenses, visa or work permits fees, medical tests, or recruitment agency fees. This principle applies particularly when the employer initiates the recruitment of workers across borders, including through recruitment agencies or international hiring programs. In such cases, workers should not be forced to pay fees to obtain employment, nor should they be forced to go into debt to be able to work. However, when individuals migrate independently and apply for jobs locally, outside of any employer-led recruitment process, the responsibility for

immigration-related costs may fall outside the scope of this principle. Regardless of the context, workers must be free to leave their employment without fear of losing part of their salary for the fees related to their recruitment or being forced to repay debts related to their recruitment.

Freedom of association and the right to collective bargaining

METRO expects suppliers to recognize workers' freedom of association and the right to collective bargaining of workers, regardless of the jurisdiction in which they operate. Employee representatives shall not be subject to discrimination or harassment. METRO expects suppliers to establish an open, respectful dialogue with their employees, thus fostering a healthy work environment.

Discrimination in employment

METRO supports the principles of equity, diversity and inclusion and expects suppliers to refrain from discriminating against their employees for any of the following reasons: age (except as provided by law), ancestry, colour, race, citizenship, civil, marital or family status (including single status), ethnic or national origin, place of origin, gender identity or gender expression, language, disability, political convictions, existence of a criminal record, beliefs, including religious beliefs, sex (including pregnancy and breastfeeding), sexual orientation, social condition or any other legally prohibited grounds for discrimination in the hiring process and every aspect of work life.

Harassment, intimidation and violence

METRO expects suppliers to maintain a work environment of dignity, respect, courtesy and cooperation, and to not tolerate any form of violence, intimidation or harassment.

Respect for obligations under work relationships

METRO expects suppliers to set out terms and conditions for hiring and dismissal that are in compliance with applicable laws. Employees must have access to documents outlining these terms and conditions in the local language or in a language understood by the employees.

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Occupational health and safety

METRO expects suppliers to provide their employees with a healthy, hygienic and safe work environment and to take all measures to prevent work-related injuries, illnesses and accidents. Particular attention must be paid to the most vulnerable groups, such as pregnant women, young people, migrant workers and workers with disabilities. Suppliers must also adopt specific preventive measures in work situations involving increased risks, in particular in the presence of dangerous products, heavy machinery or exposure to extreme weather conditions. Suppliers must implement clear occupational health and safety procedures, including assigning responsibility of these procedures to an executive. Their employees should be consulted to identify risks and preventive or corrective measures to be put in place, and health and safety training should be offered to them on a regular basis.

Workers' accommodation

METRO recognizes that it is not generally desirable for employers to provide housing directly to their workers, except when circumstances make it necessary.

When accommodation is provided, METRO expects suppliers to ensure decent and safe housing conditions for their employees. Workers must be able to access the accommodation easily and freely, without the associated cost being excessive in relation to their income. Accommodations must be clean, hygienic and safe, include access to potable water, provide adequate protection from the elements, and offer sufficient living space to preserve privacy. These safety, hygiene and comfort standards also apply to crew accommodation in industries such as fishing.

METRO expects suppliers to implement regular inspection or audit procedures, to oversee the improvement and modernization of buildings and facilities, to appoint a manager or committee in charge of accommodation sites, and to establish communication mechanisms for workers to raise any concerns about their housing, in the local language or in a language understood by the employees.

Duration of working time

With regard to working hours, suppliers must

comply with national laws or industry or international standards, whichever provides the best protection to ensure the health, safety and well-being of employees. A regular workweek should not exceed 48 hours, excluding any overtime, which must be reasonable and remunerated. Employees shall be entitled to at least one day of rest per week.

Salaries and benefits

The wages and benefits paid out to employees for a workweek must meet or exceed the minimum legal wage, industry standards or collective agreement if applicable, whichever is most beneficial to the employee. The employee must be paid on a regular basis and receive a pay slip. Suppliers shall not withhold salaries as a disciplinary measure without notifying the employees in advance. Any delay in the payment of salaries must be justified and exceptional.

Grievance mechanisms and remediation

METRO expects suppliers to put in place accessible, confidential and secure grievance mechanisms, allowing workers, their representatives and other stakeholders to report, without fear of retaliation, concerns, violations or inappropriate behaviour related to working conditions or other social or ethical issues that occurred in the workplace. These mechanisms must allow for the prompt, fair and transparent handling of grievances. Workers must be informed of the existence of these mechanisms and be able to use them easily, in the local language or in a language understood by the employees. METRO also expects suppliers to take effective remedial measures to correct any problematic situation, ensuring that the damage caused is repaired and that its recurrence is prevented.

3.3 Environmental protection

METRO seeks to purchase goods and services stemming from practices that are respectful of the environment and which aim to reduce the environmental footprint at every phase of their life cycle. METRO suppliers must give high priority to environmental issues and implement initiatives to foster sound environmental management through practices that prevent pollution and preserve resources.

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At minimum, METRO expects suppliers to comply with the environmental laws that apply in the countries in which they operate

In addition, METRO expects suppliers to adopt a proactive approach with regard to significant issues in the supply chain:

Greenhouse gas emissions

Greenhouse gas (GHG) emissions contribute to climate change—a major, internationally recognized, environmental issue. METRO encourages suppliers to calculate the GHG emissions generated by their operations, products and services, to adopt measures to reduce them, to set science-based reduction targets and to favour a transparent disclosure approach of their GHG emissions. METRO also encourages suppliers to integrate climate risks into their adaptation strategy to strengthen their climate resilience to extreme events such as floods, droughts and storms.

Water

METRO expects suppliers to preserve water and optimize its use by adopting practices to reduce consumption and minimize the release of pollutants into waterways and groundwater.

Soil health

METRO expects suppliers—those in the agri-food industry in particular—to adopt practices that promote soil quality, such as the principles of regenerative agriculture, including composting, cover crops, crop rotation, and mixed farming.

Natural resources, ecosystems and biodiversity

METRO expects suppliers to adopt practices that promote optimal and responsible use of natural resources, whether renewable or non-renewable, in order to reduce waste. METRO encourages suppliers to contribute to the preservation of biodiversity and the protection and restoration of ecosystems, particularly critical natural environments such as forests, wetlands and coral reefs.

Chemicals and hazardous substances

The use of certain chemicals, including pesticides and chemical fertilizers, as well as other hazardous substances, can have harmful effects on the

environment and human health. METRO expects suppliers to reduce or eliminate the use of these substances where possible and to favour safer alternatives.

Circular economy and waste management

METRO expects suppliers to adopt practices aimed at preventing and reducing waste, including re-examining design and production practices at the source and reducing the consumption of single-use plastics. METRO encourages suppliers to prioritize reuse, recycling and composting, while minimizing landfilling and incineration of waste, and to explore innovative circular solutions.

3.4 Respect for animal health and welfare

METRO recognizes animals, whether terrestrial or aquatic, as sentient beings, capable of feeling pain, fear and stress, and seeks to ensure their health and welfare across the supply chain.

Scientific basis

METRO expects suppliers to refer to science-based standards recognized by members of their industry, including the codes and guidelines developed by the National Farm Animal Care Council (NFACC).

Rearing, fishing, transport and slaughter practices

METRO expects suppliers to prevent all forms of abuse that negatively impact the health and welfare of animals and to ensure the physical and behavioural needs of animals are met, whether during rearing, fishing, transport or slaughter.

More specifically with regard to food products, METRO expects meat, poultry, egg, milk, dairy product, fish and seafood suppliers to respect animals and to adopt practices recognized as adequate for their health and well-being, particularly with regard to space and housing, access to water and food, protection against extreme temperatures and bad weather, transport duration and stunning at the slaughterhouse. Suppliers should take into account the five areas of animal welfare, including nutrition, environment, health, natural behaviours and the mental state of animals.

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Antibiotics and other growth factors

The inappropriate use of antibiotics in agriculture, such as growth promoters in livestock, is associated with antibiotic resistance, which compromises the effectiveness of antibiotic treatments in both humans and animals.

METRO encourages suppliers to reduce or eliminate the preventive use of antibiotics, particularly those considered important for human medicine.

METRO also encourages suppliers to limit or eliminate the use of hormones and other drugs used as growth promoters.

Animal testing

METRO encourages suppliers to ban animal testing, except when required by a regulatory authority. In such cases, METRO recommends exploring alternatives to animal testing, reducing its use to what is strictly necessary, and minimizing pain, suffering, and stress to animals, while optimizing methods to respect their welfare.

4. Implementation and compliance

4.1 Responsibilities regarding the enforcement of the Code of Conduct

METRO's vice-presidents oversee the application of the Code of Conduct by the suppliers with whom their department deals.

4.2 Compliance and application of the Code of Conduct

The Code of Conduct is an integral part of the business agreement that governs METRO's relations with each of its suppliers. METRO bases compliance and the application of the Code of Conduct on a rigorous, transparent, collaborative and continuous improvement approach with suppliers.

To ensure compliance and the application of the Code of Conduct, METRO reserves the right to follow up with direct and indirect suppliers through a range of implementation tools (used according to the situation):

- Supplier self-assessment questionnaires, including through a third party

- Continuous improvement program
- Audits by METRO or a third-party

4.3 Complaints and reports

In addition, confidential mechanisms to report issues are available:

- By telephone at 1-877-700-7867 (toll-free)
- By mail (with the reference Confidential) to Metro inc., Senior Director, Corporate Security and Resilience, 7151 Jean-Talon Street East, 9th floor, Montréal, Québec H1M 3N8
- By e-mail to: speakup@metro.ca
- On the following website: timetospeakup.ca

Reports are handled by an independent firm.

4.4 Responsibilities of the supplier

METRO encourages suppliers to implement policies, codes of conduct or management processes that account for the principles set out in this Code of Conduct. METRO considers it to be the responsibility of suppliers to comply with the principles set out in the Code of Conduct across their supply chains and carry out relevant followups with their own suppliers.

The practices adopted by suppliers must be verifiable. Suppliers must be able to provide METRO with documents attesting to their compliance with the Code of Conduct upon the company's request.

To ensure the optimal implementation of the Code of Conduct, METRO also encourages suppliers to inform the company of the measures taken to enhance their corporate practices and share their suggestions on how METRO can best contribute to the implementation of the principles set out in the Code of Conduct. METRO expects to be informed by suppliers of any obstacles to the application of this Code of Conduct.

4.5 Non compliance

Should a supplier fail to comply with the Code of Conduct, METRO reserves the right to require corrective actions. In the case of a serious failure to comply, METRO may reconsider its business relationship with the supplier.

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5. Glossary

Recruitment Fee: refers to all and any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.

Remediation: refers to both the process of remedying a negative impact on human rights and the concrete results that can counterbalance or repair the negative impact. These outcomes can take various forms, such as apologies, restitution, rehabilitation, financial or non-financial compensation, punitive sanctions (criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.

Natural resources: elements found in or derived from nature that humans can use to meet their needs through products or services. These resources may be renewable or non-renewable. They include air, water, sunlight, land, vegetation including forests and crops, animal life and geological resources.

Debt bondage: is a form of forced or compulsory labour and refers to the status or condition resulting from a worker (sometimes their family as well) being forced to work for an employer in order to repay their own debts or those they have inherited.

Human trafficking: refers to the recruitment, transportation, transfer, harbouring or receipt of a physical person for the purpose of exploitation, by the threat of use or use of force or other forms of coercion, by abduction, fraud, deception, abuse of power or of a position of vulnerability, or by the giving or receiving of payments or benefits to obtain the consent of one person having authority over another. Exploitation can take different forms, including sexual exploitation, forced labour, slavery, servitude or organ removal.

Forced or compulsory labour: refers to any work or service exacted from an individual under the threat of any penalty and for which the said individual has not offered himself or herself voluntarily.

Child labour: refers to any work that deprives children of their childhood, potential and dignity, and that harms their physical and mental development. This includes work that is mentally, physically or socially dangerous and harmful to

children; and/or interferes with their schooling by depriving them of the opportunity to attend school; forces them to leave school early; or forces them to try to combine school attendance with excessively long and heavy work.

Migrant worker: refers to any person who will engage in, is engaged in or has been engaged in paid work in a country of which they are not a national. In other words, it refers to a person who migrates from one country to another with the intention of taking employment other than for their own account.

Seasonal worker: refers to a type of migrant worker whose activity, by its nature, depends on seasonal conditions and can only be carried out for part of the year.

Temporary foreign worker: refers to a type of migrant worker who is authorized to engage in paid employment in a foreign country for a specific period of time. This status is generally tied to a fixed-time employment contract, often as part of temporary immigration programs or to meet specific labour market needs, such as labour shortages or seasonal jobs.