



GRI Content Index

Statement of use

Metcash Limited has reported the information cited in this GRI Content Index for the period 1 May 2022 to 30 April 2023 with reference to the GRI Standards.

GRI 1 used

GRI 1: Foundation 2021

GRI 2: General Disclosures 2021

Disclosure	Location	Response
2-1 Organisational details	Annual Report 2023 – Pages 2, 124	Australian Stock Exchange listing under MTS.
2-2 Entities included in the organisation's sustainability reporting	Annual Report 2023 – Appendix B Annual Report 2023 – Financial Report Appendix 4E	<p>Entities included in Metcash 2023 sustainability reporting are those considered operationally controlled * during the reporting period, unless otherwise stated. Data present in the sustainability reporting is sourced from Group functions who separately collect and verify data relevant to their functions/operations. Metcash 2023 Financial Statement is available in the public domain via the Metcash website. Metcash Financial Report was audited by an external third party (see Annual Report 2023).</p> <p>Metcash does not incorporate minority interest information or data into its sustainability reporting. Our sustainability reporting includes data on all entities that it has a majority share in, including recent acquisitions and majority mergers. Metcash approaches consolidation of information and data based on the available data, and how it's collected throughout the business. Primarily, we take the same approach to disclosures for the pillars of Hardware, Food and Liquor. Depending on material topic, Metcash may provide disclosure for total Metcash, or individual pillars, based on the availability of the information.</p> <p>*'operationally controlled' refers to the sites that Metcash is responsible for reporting on under the National Greenhouse and Energy Reporting (NGERS) Act</p>
2-3 Reporting period, frequency and contact point		Contact Point: Steve Ashe (steve.ashe@metcash.com, sustainability@metcash.com) Financial and Sustainability Reporting period is May 2022 to April 2023, unless otherwise stated. Sustainability reporting is published annually.
2-4 Restatements of information	Sustainability Report 2022 – Page 13	
2-5 External assurance	Sustainability Report 2023 – Page 14	The Sustainability Report 2023 is internally audited, and requires review from the Board of Directors before publication.
2-6 Activities, value chain and other business relationships	Annual Report 2023 – Page 2	
2-7 Employees		Employee numbers are reported in headcount, as at the end of the reporting period. There are no significant fluctuations to report. Throughout the reporting period headcount has increased by around 5% (318 increase). Of this, 157 were from Food and 147 from IHG representing an uplift of 5% and 6% respectively.

Total Employees, broken down by gender and region and type of employment:

	Permanent employees	Temporary employees	Non-guaranteed hours employees	Full-time employees	Part-time employees	Total employees
Total	5,727	177	1,208	5,332	572	7,112
Female	1,814	99	369	1555	358	2,282
Male	3,912	78	839	3,776	214	4,829
Non-Binary	1	0	0	1	0	1
ACT	56	0	10	51	5	66
NSW	1,637	110	246	1,608	139	1,993
NT	90	1	31	85	6	122

NZ	90	1	29	80	11	120
QLD	1,181	11	158	1,112	80	1,350
SA	609	5	232	515	99	846
TAS	236	1	124	202	35	361
VIC	1,407	45	302	1,297	155	1,754
WA	421	3	76	382	42	500

*These figures are based on employees of Metcash Trading Limited and 100% owned entities. Contractors not employed by Metcash Trading Limited, Total Tools employees, JV employees are not included.

2-8 Workers who are not employees		We are not able to report on the number of workers who are not employees, we only retain data for workers who are directly employed.
2-9 Governance structure and composition	Corporate Governance Statement 2023 – Pages 4-10 Annual Report 2023 – Pages 34-35, 46-47 Metcash Board Charter Metcash Board of Directors	
2-10 Nomination and selection of the highest governance body	Corporate Governance Statement 2023 – Page 7 Metcash Board of Directors	
2-11 Chair of the highest governance body	Annual Report 2023 – Pages 34-35	
2-12 Role of the highest governance body in overseeing the management of impacts	Corporate Governance Statement 2023 – Pages 4-10 Sustainability Report 2023 – Page 9	Recognising the growing importance of ESG and our material topics, the Board has established a separate Safety and Sustainability Committee as of 1 May 2023, chaired by Christine Holman. The committee oversees Metcash strategy and activities related to ESG.
2-13 Delegation of responsibility for managing impacts	Corporate Governance Statement 2023 – Pages 4-10 Sustainability Report 2023 – Page 9	
2-14 Role of the highest governance body in sustainability reporting	Metcash Limited Board Charter – Page 1 Sustainability Report 2023 – Pages 5-6, 9	The Metcash Board reviews the Sustainability Report before publication. The Board is an engaged stakeholder with material topic priorities; these priorities can be found within the Sustainability Report.
2-15 Conflicts of interest	Annual Report 2023 – Pages 46-47 Board Charter 2023 – Page 6	Every Board and Board Committee agenda includes 'Apologies and Conflicts of Interests'.
2-16 Communication of critical concerns		The ESG Council receives all escalations of critical concerns. During the FY23 period, two critical concerns were raised.
2-17 Collective knowledge of the highest governance body		The Board receives updates from the ESG Council four times per year, advancing collective knowledge and experience. A sustainability session also took place during FY23, including a review of our target aligned to the Science Based Target for Scope 1 and 2 emissions reductions.

2-18 Evaluation of the performance of the highest governance body	Metcash Limited Board Charter – Page 5	Board performance is evaluated annually by external parties. No changes have occurred in the governance body composition as a result of these evaluations.
2-19 Remuneration policies	Annual Report 2023 – Pages 49-67	
2-20 Process to determine remuneration	Annual Report 2023 – Pages 49-67 Annual General Meeting 2022 – Page 2	
2-21 Annual total compensation ratio		Annual total compensation ratio of the organisations highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual) was Highest Paid 41 : 1 Median. The ratio of the percentage increase across the same variables was Highest Paid 1 : 3.5 Median. The ratios were calculated on 30 April 2023 Total Target Compensation of CEO versus median Total Target Compensation of salaried employees as at 30 April 2023.
2-22 Statement on sustainable development strategy	Annual Report 2023 – Page 9 Sustainability Report 2023 – Page 2	
2-23 Policy commitments	Anti-Slavery Policy Modern Slavery Statement 2022 Corporate Governance Statement 2023 Sustainability Report 2023	The Board of Directors approves key policies, such as the Modern Slavery Statement, Corporate Governance Statement.
2-24 Embedding policy commitments	Anti-Slavery Policy Modern Slavery Statement 2022 Corporate Governance Statement 2023 Sustainability Report 2023 – Page 9	Metcash provides training on key policies (for example Code of Conduct), which is available and mandatory to all of our permanent employees. Permanent employees are required to take regular renewal training for some of these policies. Sustainability policy is set by the ESG Council and reviewed by the GLT (Group Leadership Team) which is overseen by the Board of Directors.
2-25 Processes to remediate negative impacts	Speak Up Policy MF&G Dispute Policy Modern Slavery Statement 2022	Metcash has partnered with NAVEX EthicsPoint as a solution for addressing negative impacts from our Supply Chain. Metcash also has visibility over the SEDEX submitted audits; and we follow-up on supply chain non-conformances, working with our stakeholders to directly address, and where possible, resolve the issue. Metcash has a Speak Up policy that allows and encourages all employees and non-employees covered by the policy to report suspected 'Reportable Conduct'. This policy allows any person to make a report internally, or externally to an independent Ethics Hotline. In FY24, we have plans to rollout a method of tracking the effectiveness of our grievance mechanisms.
2-26 Mechanisms for seeking advice and raising concerns	Speak Up Policy MF&G Dispute Policy	Our People See something say something is a guideline introduced in FY23 designed to support our team leaders and members to continue to build a constructive culture, which supports a safe work environment where everyone feels included and able to be their authentic selves at work. Each site has a designated champion who has undergone training with our Employee Relations team.

[Modern Slavery Statement 2022](#)

Employee Assistance Program (EAP) is one of the programs available to employees which is supported by a third-party, offering confidential support from experienced clinicians. Support offered spans many categories including mental health support, stress management, improving physical health and navigating challenging financial times.

Our Suppliers

The Food pillar has a clear dispute resolution for Suppliers dealing with Metcash Food & Grocery. The supplier has five available options for raising and resolving disputes, which is available for viewing via the Metcash website.

2-28 Membership associations	Sustainability Report 2023 – Page 19	
2-29 Approach to stakeholder engagement		Metcash engages a variety of internal and external stakeholders, representing all elements of our supply chain. Engagements with stakeholders are designed to be meaningful and are used to gather data, opinions and feedback on current and future sustainability plans and targets. We engage our stakeholders through a variety of mechanisms including: workshops, interviews and surveys. We ensure that engagements are meaningful through analysis and playback. Stakeholders are identified by appropriate committees, such as the ESG Council.
2-30 Collective bargaining agreements		Approximately 34% of employees are covered by Enterprise Bargaining Agreements (EBAs). For employees who are not covered by EBAs: we a) benchmark internal and external EBAs (as relevant) where we seek to cover them by an EBA, and b) where an EBA is not the most relevant comparator, we reference and comply with the underpinning Modern Award for the work being performed.

GRI 3: Material Topics 2021

Disclosure	Location	Response
3-1 Process to determine material topics	Sustainability Report 2022 – Page 5 Sustainability Report 2023 – Pages 5-6	
3-2 List of material topics	Sustainability Report 2022 – Page 6	GRI302: Energy is an additional material topic to be included within our highest-flagged impact to the business; GHG emissions reduction, energy and climate resilience.
3-3 Management of material topics	Sustainability Report 2023	<p>Throughout the sustainability report we make reference to management of our material topics. As a business, we are actively engaging with our stakeholders so that we can better manage these topics together, as well as further our understanding of the material impacts. We actively introduce policies and brand guidelines aimed at improving environmental and social outcomes, as well as building upon our available training for our people and partners.</p> <p>In FY23 we have taken a more active role in seeking guidance around our material topics. For example, we have conducted workshops with Indigenous community leaders and groups, to better understand our impact and opportunities to make a difference in our communities. We have also collaborated with industry groups and sustainability leaders to further our understanding and approach to managing our material topics.</p> <p>Metcash ESG Council is responsible for managing and assessing our actual and potential negative social and environmental impacts. We have a variety of processes and mechanisms for our people and partners to raise grievances, which the ESG Council is able to assess, identify and act upon.</p> <p>Recognising the growing importance of ESG and our material topics, the Board has established a separate Safety and Sustainability Committee as of 1 May 2023, chaired by Christine Holman. The committee oversees Metcash ESG strategy, reporting and progress in areas identified as material by our stakeholders.</p>



GRI 202: Market Presence 2016

Disclosure	Location	Response
202-1 Ratios of standard entry level wage by gender compared to local minimum wage		Employees covered by EBAs (Enterprise Bargaining Agreements) are not discriminated on by gender. EBAs vary by state and data is not available at this level of detail. Most at risk category of employee is Labour Hire – Distribution Centres are responsible for – in consultation with the relevant agencies; these individuals employment and managing the respective workforces. Very limited National data available.
202-2 Proportion of senior management hired from the local community		Within Metcash recruitment process, there is no request for, or visibility over, an applicant or employees country of birth or nationality. Optional fields are available to capture whether the applicant or employee is of Aboriginal or Torres Strait Islander heritage.

GRI 203: Indirect Economic Impacts 2016

Disclosure	Location	Response
203-1 Infrastructure investments and services	Sustainability Report 2023 – Pages 30-31	Metcash does not support significant infrastructure investments and/or services. Charitable donations can be found within Sustainability Report 2023.
203-2 Significant indirect economic impacts	Economic and social impact of independent grocers 2022	

GRI 204: Procurement Practices 2016

Disclosure	Location	Response
204-1 Proportion of spending on local suppliers		Below data corresponds to the % of supplier purchases from suppliers local to the significant locations of operation for Metcash. Local is defined as within Australia, and significant locations of operation refers to our eight major distribution centres across all our pillars. Food – 98.6%, Liquor – N/A, Hardware – 96.1% (inc. charge-back products), Total Tools – 90.4% Data is sourced individually by pillar from relevant financial systems.

GRI 205: Anti-corruption 2016

Disclosure	Location	Response
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205-2

Communication and training about anti-corruption policies and procedures

Data breakdown by region is n/a.

91% of TEC employees have completed training related to anti-corruption (2,349/2,582). Anti-corruption policies and procedures are communicated upon completion of the training.

Our retail network access our learning management system in its various iterations. With the exception of IHG this is a voluntary involvement. On the learning management system (LMS) we have a module called Fraud Prevention, a generic education on fraud prevention. This module is accessed by the Supermarket retailers only; and is voluntary enrolment, with 53% completion rate by retailers who have enrolled to date (12,232 retailers have enrolled to date).

GRI 206: Anti-competitive Behaviour 2016

Disclosure

Location

Response

206-1

Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices

There was no legal action taken during the reporting period for anti-competitive behaviour, anti-trust or monopoly practices by Metcash Group or its employees.

GRI 301: Materials 2016

Disclosure	Location	Response
301-1 Materials used by weight or volume		No Group master data is available at the required reporting level of GRI.
301-2 Recycled input materials used		No Group master data is available at the required reporting level of GRI.
301-3 Reclaimed products and their packaging materials	Sustainability Report 2023 – Pages 19-20	<p>Reporting for period FY23 (May 2022 – April 2023) Battery Scheme for Food and Hardware Pillars: IHG collected 20,817kg (348 Stores, 63% store coverage), Total Tools collected 24,714kg (108 stores, 100% coverage). Food collected 98,538kg (554 Stores).</p> <p>In 2023 Metcash has successfully launched a pilot program for recycling coffee pods in collaboration with Planet Ark.</p>

GRI 302: Energy 2016

Disclosure	Location	Response
302-1 Energy consumption within the organisation	Sustainability Report 2023 – Pages 13-14	<p>Fuel Consumption within the organisation from non-renewable resources:</p> <ul style="list-style-type: none"> Diesel Stationary – 232 GJ Diesel Transport – 87,344 GJ Ethanol E10 post 2004 – 193 GJ LPG Stationary – 18,386 GJ Petrol Transport post 2004 – 6,699 GJ Natural Gas – 4,847 GJ <p>Electricity consumption: 294,829 GJ (4,060 GJ produced by onsite Solar)</p> <p>Total Energy Consumption for Metcash operationally controlled sites: 412,530 GJ</p> <p>Data is sourced in alignment with GHG Protocol principles. Estimations have been applied as per the NGER Delivery FY22 report. Universal energy conversion such as kWh to MJ, MJ to GJ. LPA is a density based weight to volume conversion from the EPA Greenhouse Gas Reporting Program.</p>
302-3 Energy intensity	Sustainability Report 2023 – Pages 13-14	Fuel, Electricity and Natural Gas included in energy intensity ratio, and references energy consumption from within Metcash operational control.
302-4 Reduction of energy consumption	Sustainability Report 2023 – Pages 13-14	

GRI 303: Water and Effluents 2018

Disclosure	Location	Response
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303-5 Water consumption	Sustainability Report 2023 – Page 21	For the period July 21 - June 22 (NGERS 22) total water consumption across mega distribution centres was 87.53 megalitres, with no consumption from areas with water stress.
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GRI 305: Emissions 2016

Disclosure	Location	Response
305-1 Direct (Scope 1) GHG emissions	Sustainability Report 2023 – Pages 11, 13-14 Sustainability Report 2022 – Page 13	Reported data is in reference to the NGERS 2022 period (July 2021 to June 2022). Gases included in the calculation; CO2, CH4, N2O, HFCs (for refrigerant calculations assumed leakage rates were used). Metcash baseline year was established in 2020 (7,364 tCO2e Scope 1). In 2022 we rebaselined with the acquisition of Total Tools to 15,055 tCO2e. Emission factors, global warming potential rates (GWP) for emissions are all sourced/referenced from Australian Government NGERS guidelines. Metcash consolidates emissions at a Group level, for sites that are operationally controlled. As part of the Sustainability Linked Loan, NGERS 22 data was externally audited.
305-2 Energy indirect (Scope 2) GHG emissions	Sustainability Report 2023 – Pages 11, 13-14 Sustainability Report 2022 – Page 13	Reported data is in reference to the NGERS 2022 period (July 2021 - June 2022). Metcash's baseline year was established in 2020 – Scope 1 and 2 was 72,948 tCO2e. In 2022 we rebaselined with the acquisition of Total Tools to 66,180 tCO2e, resulting in a Scope 1&2 2020 baseline of 81,235 tCO2e. Emission factors, global warming potential rates (GWP) for emissions are all sourced/referenced from Australian Government NGERS guidelines. Metcash consolidates emissions at a Group level, for sites that are operationally controlled. As part of the Sustainability Linked Loan, NGERS 22 data was externally audited.
305-3 Other indirect (Scope 3) GHG emissions	Sustainability Report 2023 – Pages 13-15	Reported data is in reference to the NGERS 2022 period (July 2021 to June 2022). Our FY22 Scope 3 emissions (Sustainability Report 2022 – NGERS 21 period) were 863,120 tCO2e. Metcash consolidates emissions at a Group level, for sites that are operationally controlled. Estimated Scope 3 emissions have been allocated into three segments – organisational, upstream and downstream emissions (see Sustainability Report for breakdown).
305-4 GHG emissions intensity		Organisations specific metric is area (metres squared) for operationally controlled sites used in NGERS 22 period. Emissions included: Scope 1 and 2. Gases included: CO2, CH4, N2O and HFCs (NGERS).
305-5 Reduction of GHG emissions		4,047 emissions reduction for Scope 1 and 2, against LYs NGERS 21. Gases included; CO2, CH4, N2O, HFCs, using NGERS 22 assumptions and refrigerant assumed leakage rates.

GRI 306: Waste 2020

Disclosure	Location	Response
306-1 Waste generation and significant waste-related impacts	Sustainability Report 2023 – Page 18	Non-recyclable or excessive use of paper and plastic materials are Metcash most significant impacts and are linked to packaging selection and waste disposal. This includes: product packaging from consumer goods (upstream), inbound transport packaging (upstream and within Metcash operations), as well as outbound transport packaging (downstream and within Metcash operations). Within the broader value chain food waste at stores and on-farm are also areas of impact.
306-2 Management of significant waste-related impacts	Sustainability Report 2023 – Page 18	Metcash uses multiple third party vendors across its portfolio of sites. Periodically, we check in with these vendors to understand how the collected waste is being managed with regards to legislative obligations. Our waste data is provided by these vendors both digitally (via a portal or automatic reporting) and manually. For vendors with digital data, this data is delivered directly into our ESG tool.
306-3 Waste generated	Sustainability Report 2023 – Page 18	*Food and Liquor only. Our vendors provide waste data to a contracted third-party sustainability data partner that compiles the information. The data is split into different streams where applicable. Other vendors provide waste data either manually, or through self-serve online portals.
306-4 Waste diverted from disposal	Sustainability Report 2023 – Page 18	*Food and Liquor only. Our vendors provide waste data to a contracted third-party sustainability data partner that compiles the information. The data is split into different streams where applicable. Other vendors provide waste data either manually, or through self-serve online portals.

Metcash utilises third-party vendors to dispose of hazardous and non-hazardous waste as part of the waste collection process.

GRI 308: Supplier Environmental Assessment 2016

Disclosure	Location	Response
308-1 New suppliers that were screened using environmental criteria		<p>Food: All Private Label suppliers are required to complete either a Self-Assessment Questionnaire (SAQ) that includes environmental criteria, or be members of BSCI or a similar equivalent. The SAQ covers a significant range of topics including: environmental management plans, certification to recognised environmental management system, pollution controls, compliance to legislation relating to waste disposal, environmental policy, assessment of company environmental effects, program for reducing energy consumption, waste minimalisation/reduction, packaging reduction, recycling program, water supply and treatment, hazardous waste treatment, refrigerant gas and refrigeration legislation compliance, environmental risks for water, air, noise, land and waste and their management.</p> <p>Liquor: Does not currently screen suppliers for environmental impact. There is a future roadmap for environmental criteria assessment. Plans to capture the current environmental and sustainability accreditations (wastewater treatment, recycling of input materials, energy efficient initiatives etc.) as part of our supplier onboarding process enhancements for our own-brand products.</p> <p>Hardware: Mitre 10/HTH: Responsible Timber Sourcing Policy – All of our timber suppliers were screened against this policy and are compliant. Please note that this does not mean that all timber suppliers are PEFC/FSC certified. Total Tools: No environmental screening occurring.</p>
308-2 Negative environmental impacts in the supply chain and actions taken		<p>Food: All Private Label suppliers are required to complete either a Self-Assessment Questionnaire (SAQ) that includes environmental criteria, or be members of BSCI or a similar equivalent. We are transitioning from manual data collection, to system-driven in FY24 (this process began in FY23). Through this transition phase suppliers are being re-reviewed. We also have plans to embed environmental information gathering into our joint-partnerships with top suppliers across the Food business.</p> <p>Liquor: Does not currently screen suppliers for environmental impact. There is a future roadmap for environmental criteria assessment. Plans to capture the current environmental and sustainability accreditations (wastewater treatment, recycling of input materials, energy efficient initiatives etc) as part of our supplier onboarding process enhancements for our own-brand products.</p> <p>Hardware: Mitre 10/HTH: No suppliers were found to have negative environmental impacts within the scope of our assessments conducted. Total Tools: N/A as no screening.</p>

GRI 401: Employment 2016

Disclosure	Location	Response
401-1 New employee hires and employee turnover	Sustainability Report 2023 – Page 24	
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees		<p>Parental Leave benefits are applicable to all permanent employees regardless of gender. 12 weeks paid for primary carers, 18 weeks of superannuation, four weeks paid for secondary carers. Parental leave covers: Birth, Adoption, Surrogacy and Stillbirth. There is no qualifying period for access to parental leave.</p> <p>Significant locations of operation is limited to region of operation; Australia and New Zealand.</p>
401-3 Parental leave		<p>Parental leave policy covers all employees – the leave entitlement will vary based on employment status.</p> <p>Total number of employees that took parental leave in the reporting period, by gender: Primary Carers: 105 Female, eight Male Secondary Carers: 113 Male</p> <p>Total number of employees that returned to work in the reporting period after parental leave ended, by gender: Primary Carers: 96 Female, eight Male Secondary Carers: 113 Male</p> <p>Return to work and retention rates of employees that took parental leave, by gender: Primary Carers: 91% Female, 100% Male Secondary Carers: 100% Male</p> <p>Data is sourced from internal payroll system and is in line with WGEA reporting periods of 1 April 2022 - 31 March 2023. Payroll system is subject to regular internal and external audits.</p>

GRI 402: Labour/Management Relations 2016

Disclosure	Location	Response
402-1 Minimum notice periods regarding operational changes		<p>The minimum number of weeks notice typically provided to employees and their representatives varies in accordance with their industrial instrument (i.e. the award or enterprise agreement). The underpinning award (for employees not covered by an EBA) has no minimum period notice for major changes and roster changes, as per the award; but if we have to give notice, we would seek to give what we deem an appropriate amount of notice.</p> <p>We comply with the notice periods and obligations set out in each enterprise bargaining agreement. Metcash defaults to meeting the minimum requirements; depending on the situation we may go above and beyond the minimum obligation. Data collection is manual – as set out in each EBA. Fair Work Commission approves EBAs.</p>

GRI 403: Occupational Health and Safety 2018

Disclosure	Location	Response
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403-1
Occupational health and safety management system

Metcash has a Safety and Health Management System based on ISO 45001 and reviewed regularly against Australian and New Zealand legislative requirements. The Safety and Health Management System is integrated into operations, and provides a framework to manage risks and hazards across distribution centres and warehouses, retail and trade stores, manufacturing sites and corporate support offices.

The management system covers all activities undertaken by Metcash-owned and majority-owned entities and includes performance monitoring of contractors' activities.

Our internal audit program ensures the continuing suitability and effectiveness of the H&S management system. Third party verification audits occur as required; in FY22 an audit was conducted against chain of responsibility requirements.

403-2
Hazard identification, risk assessment, and incident investigation

Metcash has risk management processes to identify work-related hazards including hazard reports, risk assessments, workplace inspections and incident reporting which seek input and involvement from team members and contractors. Team members are also trained to identify, assess, control (where possible) and report hazards they observe. Hazards are assessed using a risk matrix for health and safety to determine a risk rating based on the severity and likelihood of harm. Metcash uses the results of these processes and reviews its risk profile to continually improve the Safety and Health Management System. An output of the last review included a prioritised list of our safety and health risks and risk mitigation plans are being developed for our Top 10 risks to identify where existing controls can be strengthened or new controls can be developed by applying the hierarchy of controls.

Workers are able to report work-related hazards and hazardous situations directly to their supervisors or their Health and Safety Representative or safety committee team member, through hazard report forms (hard copy or soft copy through Protecht, our online safety reporting system), or anonymously using the Speak Up program. Metcash encourages hazard reporting and for workers to stop when they feel their safety is at risk.

Metcash has an issue resolution procedure that outlines where an issue or hazard has been identified by a worker, the worker shall report it to their supervisor and may also bring it to their Health and Safety representatives attention. Where the issue/hazard poses an imminent threat to the worker's health and safety, the health and safety rep may direct work to cease. Every attempt should be made to resolve the issue/hazard as soon as practicable.

Metcash has an Incident Management Standard that outlines the process for how incidents are managed, reported, investigated and actioned, taking into consideration the hierarchy of controls to eliminate or minimise the risk or re-occurrence wherever possible.

403-3
Occupational health services

[Sustainability Report 2023 – Page 25](#)

Metcash provides various occupational health service functions and benefits to support the health, safety and wellbeing of our team members and contractors. We utilise the services of ergonomists, physiologists and physiotherapists, psychologists, and occupational health nurses, and other allied health specialists as required, to assist with identification and management of health and safety risks that may impact the health and wellbeing of our team members and contractors. The way these services are utilised varies by business unit, based on type of activities and risk exposures. Metcash ensures the quality of the services by using independent occupational health service providers with recognised qualifications and accreditations. Confidential counselling and proactive support services are provided through Benestar, our employee assistance program provider; and we have a large Mental Health First Aid Network across all of our sites.

403-4
Worker participation, consultation, and communication on occupational health and safety

Metcash has documented procedures in relation to worker participation and consultation on health and safety issues that may affect them directly in the workplace, including when:

- Identifying or assessing hazards or risks and making decisions on how to control them
- Introducing or amending the procedure for monitoring risks
- Changes to systems of work
- Introduction of new plant and equipment
- Major Capital Projects
- Local Projects
- Changes to Environment and Health and Safety documentation

There are processes for formal communication with workers through toolbox talks, safety noticeboards and committee meetings.

Metcash has a safety representative procedure which outlines processes for the establishment and configuration of the H&S committee or other arrangements such as H&S representatives, the function of the committee and meeting frequency, the roles and responsibilities of committee members, as well as the determination of designated work groups.

403-5

Worker training on occupational health and safety

Metcash has a documented process outlining the safety and health training framework. This includes a process for a safety and health training needs analysis to be developed and regularly reviewed, taking into consideration the organisational needs and legal obligations. A training plan is then developed outlining the training that each role requires, which includes legislative, formal, on-the-job and refresher training requirements. Sites are required to review for their site specific requirements and implement the training plan so that team members are trained appropriately to perform their work safely. Training is delivered using a variety of methods depending on the needs of the participant and the content type. Training covers areas such as hazard awareness, risk management, incident investigation, contractor management, task and job related skills and safe operating procedures for equipment. Training may be delivered by registered training organisations or in-house depending on the content, and is designed and delivered at a level suitable for team members.

403-6

Promotion of worker health

Our health and wellbeing program is offered to all team members. Access is driven through a dedicated intranet page, in addition to a My Wellbeing channel on the employee communications app Our Local. Further to this we have visible collateral across our sites. Metcash also offers discounted access to health insurance, health and wellbeing services, onsite exercise equipment and physiotherapy* and a flu shot program. Communication of these benefits is facilitated to several channels such as the intranet, employee communications app and local toolbox talks and visual collateral.

*Not available at every Metcash site.

403-7

Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

At Metcash, we take the health and safety of workers seriously, and we require our direct suppliers of private label products to adhere with various Occupational Health and Safety (OH&S) requirements outlined in the Metcash Supply Standards, which includes fatigue management of drivers of heavy vehicles.

In addition, our private label suppliers are required to complete a 100% Supplier Ethical Data Exchange Self-Assessment Questionnaire (SEDEX SAQ) to demonstrate their compliance with ethical and social standards. We adopt a risk-based approach to focus on social compliance risks and use internal routine surveillance and social audits to monitor our suppliers compliance. Some of our Private Label suppliers have undergone social audits to ensure that they meet our ethical and social standards, which includes OH&S. We believe that our approach to supply chain sustainability is essential to creating a safe and responsible business, and we remain committed to working with our suppliers to maintain the highest ethical and social standards.

We also undertake Transport Carrier reviews and encourage and support related wellbeing initiatives such as Health Heads in Trucks and Sheds.

We have a Contractor Management Standard which sets expectations for our business to establish contractor safety management processes that address obligations of our contract partners including managing hazards and risks associated with work performed for or on behalf of Metcash.

403-8

Workers covered by an occupational health and safety management system

External contractors have been excluded from this disclosure as we do not currently capture contractor hours completely across the business.

Data collected using both the Protecht online safety reporting system (where available) and manually via emails and entered into a spreadsheet. The methodology used for collecting, collating and calculating data as well as defined reporting boundaries will be found in the SHE-GS-109 Monitoring, Measurement, Analysis and Performance Evaluation Standard, which is currently in development, scheduled for completion in August 2023.

403-9 (a-c)
Work-related injuries

For direct employees only.

Number and rate of fatalities, as a result of work-related injury: 0, 0.00
Number and rate of high-consequence work-related injuries (excl. fatalities): 10, 0.79
Number and rate of recordable work-related injuries: 229, 18.02
Main types of work-related injuries: Injuries to back, shoulder, and hands
Number of hours worked: 12,711,350

For labour hire employees only.

Number and rate of fatalities, as a result of work-related injury: 0, 0.00
Number and rate of high-consequence work-related injuries (excl. fatalities): 0, 0.00
Number and rate of recordable work-related injuries: 54, 35.15
Main types of work-related injuries: Injuries to back, shoulder, and hands
Number of hours worked: 1,536,151

*rates are calculated based on 1,000,000 hours worked.

The work-related hazards that pose a risk of high consequence injury were determined by reviewing the organisational risk profile, which uses information from site risk registers in all the pillars. Our top risks that can cause high consequence injuries include Manual Handling, Pedestrian – MHE-Vehicle Collisions, Fleet and Heavy Vehicle Movements, Site Deliveries, Material Fall from Height, Traffic Management, Plant and Equipment Use and Fitness for Work. During the reporting period, the hazards that contributed to high consequence injuries were Site Deliveries, Material Fall from Height, MHE Collision with Vehicle. Actions underway to eliminate these risks include comprehensive risk mitigation action plans with the determination of current, developing and future controls all of which is currently under review by both the GLT and Board. These hazards are identified as part of our Critical Risks and are subject to extensive review and the development of robust risk control initiatives.

403-9 (d-g)
Work-related injuries

Metcash has robust Site Risk Registers as well as a Metcash-wide Risk Profile which outlines all work-related risks, current and emerging controls and, where appropriate, future controls that require further consideration such as capital spend. The additional list of actions to address workplace hazards is extensive and continuously changing.

External contractors have been excluded from this disclosure as we do not currently capture contractor hours completely across the business.

Data collected using both the Protecht online safety reporting system (where available) and manually via emails and entered into a spreadsheet. The methodology used for collecting, collating and calculating data as well as defined reporting boundaries will be found in the SHE-GS-109 Monitoring, Measurement, Analysis and Performance Evaluation Standard, which is currently in development, scheduled for completion in August 2023.

Of note, the labour hire hours for FY23 have been estimated from May 2022 throughout November 2022 due to a system error with the external Kronos reporting system caused by a cyber security attack in late 2021. The estimation methodology used was of the previous years actual hours worked, averaged over three months. This occurred only for labour hire hours.

403-10
Work-related ill health

For direct employees only and labour hire employees only.

Number of fatalities as a result of work-related ill health: 0
Number of recordable work-related ill health: 0

Both the Metcash and Site SHE Risk Profile identifies few work related hazards that pose a risk of ill health, other than occupational noise and exposure to cold in our perishables sheds. None of these hazards have resulted in ill health during the reporting period. Noise surveys have been undertaken to identify noise hazards and appropriate controls including hearing protection are in place. In addition, appropriate PPE such as thermal jackets/pants are worn by workers in the perishables sheds. External contractors have been excluded from this disclosure as we do not currently capture contractor hours completely across the business. Data collected using both the Protecht online safety reporting system (where available) and manually via emails and entered into a spreadsheet. The methodology used for collecting, collating and calculating data as well as defined reporting boundaries will be found in the SHE-GS-109 Monitoring, Measurement, Analysis and Performance Evaluation Standard, which is currently in development, scheduled for completion in August 2023.

Disclosure	Location	Response
404-1 Average hours of training per year per employee		During the reporting period, the average hours of training that our TEC employees undertook was 7.36 hours (19,010.9 hours across 2,582 TEC employees). There is no available breakdown by gender or employee category. Data was sourced from internal systems and manual internal documents. No third-party auditing has been undertaken on this data.
404-2 Programs for upgrading employee skills and transition assistance programs		Metcash delivers a number of programs for upskilling team members on their skills and capabilities. Each year we identify priority capabilities for development for each area of the business, as well as for all Metcash, and develop resources and training programs to upskill team members in these skills and capabilities. Priority capabilities are typically those that team members need for current work and future work projects – e.g. IT skills, soft skills, people skills. In future years of reporting we expect to be able to break down the exact courses completion data.
404-3 Percentage of employees receiving regular performance and career development reviews		All team members of Metcash are given regular career and performance feedback. Our requirement is for all leaders to conduct twice-annual formal career and performance conversations in addition to regular performance conversations in the flow of work.

GRI 405: Diversity and Equal Opportunity 2016

Disclosure	Location	Response												
405-1 Diversity of governance bodies and employees	Sustainability Report 2023 – Page 24													
405-2 Ratio of basic salary and remuneration of women to men	Annual Report 2023 – Remuneration	<p>Significant location: Australia and New Zealand. Reported on FTE – Guaranteed Base Salary. Data is sourced from internal payroll and HR systems.</p> <table border="1"> <thead> <tr> <th></th> <th>Ratio (F:M) of Basic Salary</th> </tr> </thead> <tbody> <tr> <td>CEO/KMP</td> <td>0.67:1</td> </tr> <tr> <td>Non-Manager</td> <td>1.02:1</td> </tr> <tr> <td>Other Executive/General Manager</td> <td>1.19:1</td> </tr> <tr> <td>Other Manager</td> <td>1.06:1</td> </tr> <tr> <td>Senior Manager</td> <td>1.05:1</td> </tr> </tbody> </table>		Ratio (F:M) of Basic Salary	CEO/KMP	0.67:1	Non-Manager	1.02:1	Other Executive/General Manager	1.19:1	Other Manager	1.06:1	Senior Manager	1.05:1
	Ratio (F:M) of Basic Salary													
CEO/KMP	0.67:1													
Non-Manager	1.02:1													
Other Executive/General Manager	1.19:1													
Other Manager	1.06:1													
Senior Manager	1.05:1													

GRI 406: Non-discrimination 2016

Disclosure	Location	Response
406-1 Incidents of discrimination and corrective actions taken		0 substantiated incidents of discrimination during the reporting period.

GRI 407: Freedom of Association and Collective Bargaining 2016

Disclosure	Location	Response
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407-1

Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

Operations

The business has collaborative working relationships with the unions that are entitled to represent our employees and 34% of our workforce is covered by enterprise bargaining agreements (EBAs). We have a dedicated industrial relations (IR) team that oversees IR management for the Metcash Group (Group), including identifying and responding to opportunities and risks, building relationships, enterprise bargaining negotiations and implementation, and governance and compliance. Within our Group, we support our employees' employment rights to form and participate in representative groups both internally and externally to the Group, such as consultative committees and bargaining teams.

Suppliers

Group Non-Trade Procurement

In every Metcash-issued new and revised non-trade procurement contract, we include specific clauses to address Modern Slavery.

Food

There are criteria for Freedom of Association and Collective Bargaining within the Self-Assessment Questionnaires (SAQs), including SEDEX, BSCI, SA8000. Food Private Label suppliers are required to provide audit certification reports for onboarding. Metcash has launched a third-party Speak Up program hosted by NAVEX, where workers can anonymously report any areas of concern.

Liquor

No own-brand products have been sourced from high-risk countries. Winery suppliers are all Tier 1 wineries based in Australia and New Zealand. If products are sourced from a high-risk country, an independent third-party ethical audit/report would be requested.

IHG

We are not aware of any suppliers or operations within our supply chain which currently pose a significant risk, however, we have identified suppliers who have the potential to be high risk as a result of our Modern Slavery survey conducted on 175 of our key suppliers. We are working with such identified potential high-risk suppliers through follow up regarding assistance in reducing this risk rating either by developing an MSA or providing further evidence of compliance. High risk suppliers are considered from countries and regions as defined by Amfori BSCI.

Along with the Modern Slavery survey we also provided training material on Modern Slavery to suppliers and also introduced a process for all new suppliers to complete the Modern Slavery Assessment prior to onboarding.

Total Tools

We are not aware of any suppliers or operations within our supply chain which currently pose a significant risk other than those assessed to be potentially high risk as a result of our Modern Slavery survey conducted on 124 of our local suppliers. Total Tools deems international suppliers a risk for Modern Slavery and therefore developed the below-mentioned ethical sourcing policy. Ethical sourcing policy to all international suppliers, all international suppliers are SMETA audited every two years; or a recent accredited audit report is utilised.

GRI 408: Child Labour 2016

Disclosure

Location

Response

408-1

Operations and suppliers at significant risk for incidents of child labour

Modern Slavery Report 2021 **Food:** Modern Slavery risk assessment survey sent out through all pillars to suppliers for risk mapping. No specific child labour has been identified.

Liquor: No own-brand products have been sourced from high-risk countries. Winery suppliers are all Tier 1 wineries based in Australia and New Zealand. If products are sourced from a high-risk country, an independent third-party ethical audit/report would be requested.

IHG: We are not aware of any suppliers or operations within our supply chain which currently pose a significant risk, however, we have identified suppliers who have the potential to be high risk as a result of our Modern Slavery survey conducted on 175 of our key suppliers. We are working with such identified potential high-risk suppliers through follow up regarding assistance in reducing this risk rating either by developing an MSA or providing further evidence of compliance. High risk suppliers are considered from countries and regions as defined by Amfori BSCI .

Along with the modern slavery survey we also provided training material on Modern Slavery to suppliers and also introduced a process for all new suppliers to complete the Modern Slavery Assessment prior to onboarding.

Total Tools: We are not aware of any suppliers or operations within our supply chain which currently pose a significant risk other than those assessed to be potentially high risk as a result of our Modern Slavery survey conducted on 124 of local suppliers. Total Tools deems international suppliers a risk for Modern Slavery and therefore developed the below mentioned ethical sourcing policy. Ethical sourcing policy to all international suppliers, all international suppliers are SMETA audited every 2 years or recent accredited audit report is utilised.

Group Non-Trade Procurement: In every new Metcash-issued and revised non-trade procurement contract, we include clauses specifically addressing modern slavery.

Modern Slavery Report 2022 **Corporate:** All Metcash suppliers are bound by the Responsible Sourcing Agreement, which requires compliance with relevant laws and a commitment to the Australia Modern Slavery Act 2018. Six suppliers sourced from high labour risk countries, such as China and India, lack adequate risk management, necessitating further follow-up. We collaborated with the pillars and non-trade team to roll out the SAQ for Modern Slavery risk mapping. Through this process, we identified high-risk suppliers for a thorough due diligence check and implemented remediation actions if necessary. Metcash governance structure has been updated to address the Modern Slavery issue. This structure starts with the oversight of our Board of Directors, who are responsible for overseeing the Company strategy, including its response to potential Modern Slavery risks. The operational implementation status has been put into the quarterly ESG Council meeting agendas and reported to the Board.

GRI 409: Forced or Compulsory Labour 2016

Disclosure	Location	Response
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	<u>Modern Slavery Report 2020</u> – Page 3-4	We report on our management of compulsory labour risks within our Modern Slavery Statement. In FY21 we began identifying key areas in our supply chain with potential high-risk Modern Slavery risks. Throughout FY23 we continued to monitor these risks for our suppliers through a variety of mechanisms, including:
	<u>Modern Slavery Report 2021</u> – Page 5	<ul style="list-style-type: none"> • Conducted risk screening and supplier self-assessment questionnaires for existing suppliers. • Followed up with a questionnaire for high-risk suppliers, focusing on remediation for critical issues. • Required audit certifications such as SEDEX, BSCI, and other third-party certifications for new suppliers during onboarding. • Developed supplier action plans based on the effectiveness of supplier risk management controls. • Partnered with NAVEX third-party worker hotline program to gain more visibility and a deeper understanding of labour high-risk areas in our supply chain. • Maintained close connections and regular dialogues with industry experts to gain better insight into social risk areas, share best practices, and develop a long-term strategy roadmap.

Additional pillar specific actions:

Food: Modern Slavery risk assessment survey sent out to suppliers for risk mapping. No specific child labour or forced labour has been identified.

Liquor: No own-brand products have been sourced from high risk countries. Winery suppliers are all Tier 1 wineries based in Australia and New Zealand. If products are sourced from a high-risk country, an independent third-party ethical audit/report would be requested.

IHG: We are not aware of any suppliers or operations within our supply chain which currently pose a significant risk, however, we have identified suppliers who have the potential to be high-risk as a result of our Modern Slavery survey conducted on 175 of our key suppliers. We are working with such identified potential high-risk suppliers through follow up regarding assistance in reducing this risk rating either by developing an MSA or providing further evidence of compliance. High risk suppliers are considered from countries and regions as defined by Amfori BSCI. Along with the Modern Slavery survey we also provided training material on Modern Slavery to suppliers and also introduced a process for all new suppliers to complete the Modern Slavery Assessment prior to onboarding.

Total Tools: We are not aware of any suppliers or operations within our supply chain which currently pose a significant risk other than those assessed to be potentially high risk as a result of our Modern Slavery survey conducted on 124 of our local suppliers. Total Tools deems international suppliers a risk for Modern Slavery and therefore developed the below-mentioned ethical sourcing policy. Ethical sourcing policy to all international suppliers, all international suppliers are SMETA audited every two years; or a recent accredited audit report is utilised.

Group Non-Trade Procurement: In every new Metcash-issued and revised non-trade procurement contract, we include clauses specifically addressing Modern Slavery.

GRI 411: Rights of Indigenous Peoples 2016

Disclosure	Location	Response
411-1 Incidents of violations involving rights of Indigenous peoples		No reported violations of Indigenous peoples rights during this reporting period. Incidents are flagged manually, and stored in internal systems. Our Board reviews incidents, if any, once resolved.

GRI 413: Local Communities 2016

Disclosure	Location	Response
413-1 Operations with local community engagement, impact assessments, and development programs	<u>Have your say at IGA</u>	Locals Matter Community Program is a platform that provides meaningful and engaging content and promotions that focus on educating shoppers on how to live healthy, how to get communities to thrive and tips on supporting the environment. Mintfresh Grocers (NSW, Epping) which opened in FY23 incorporated community engagement to understand what the community wanted from their new local IGA. Community feedback was used to help shape the store today. Have your say at IGA – a direct channel for shoppers to provide feedback on their IGA experience.
413-2 Operations with significant actual and potential negative impacts on local communities	<u>Have your say at IGA</u>	The Locals Matter Community Program is a platform that educates shoppers on healthy living, environment and thriving communities. We work with partners including nutritionists The Biting Truth to provide educational content including exclusive e-cookbooks, video content, tips and tricks articles and much more to our members and the public. We also have a range of healthy recipes that focuses on various health considerations including low GI, heart health, immune boosting, gut health etc.

GRI 414: Supplier Social Assessment 2016

Disclosure	Location	Response
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414-1
New suppliers that were screened using social criteria

[Sustainability Report 2023 – Page 27](#)

Food: All Private Label suppliers must be registered with SEDEX, Fair Farms or an equivalent industry recognised scheme and have 100% SAQ completion by launch.

Liquor: All own-brand product suppliers are screened using social criteria.

Hardware: Mitre 10/HTH: 100% of new suppliers within FY23 agreed to human rights obligations through the IHG purchase agreement. This included the completion of a survey regarding the Modern Slavery risk within their operations.

Total Tools: All new international suppliers sign the Trading Terms Agreement, in which the supplier agrees they have received a copy of the Total Tools Ethical Sourcing Policy and that they agree to adhere to requirements as outlined in the policy.

414-2
Negative social impacts in the supply chain and actions taken

[Sustainability Report 2023 – Page 32](#)

Food: Current Private Label suppliers are supplied by 273 supplier sites. Over 90% of our supply base having either completed 100% of the Self-Assessment Questionnaire (SAQ) on SEDEX or are BSCI certified. Furthermore, if sites progress to SMETA audits, we review non-conformances, and also use the SEDEX dashboard to promptly address any Business Critical or Critical non-conformances through our newly established social compliance escalation processes. 14 supplier sites were flagged due to overdue Business Critical or Critical non-conformances. Immediate action was taken to address these concerns and Metcash conducted an internal investigation to ensure appropriate measures were taken.

As a result of these efforts, we found that 12 out of the 14 cases had resolved their issues or had made progress in addressing their non-conformances. However, one supplier raised sufficient concerns that necessitated the escalation of non-compliance audits. This supplier operated two sites within our supply chain. In accordance with our newly established escalation process, we followed the necessary procedures internally to address the non-conformances appropriately. We have reached a mutual agreement with the supplier on a formal plan to address and resolve the remaining social compliance issues. This plan outlines specific actions that the supplier will undertake to rectify the non-conformances within the agreed-upon timeline. No cease of trade or termination has resulted from identification of significant and actual potential negative social impacts with our Private Label partners.

Liquor: 16 own-brand product suppliers assessed for social impacts. No suppliers identified as having significant actual or potential negative impacts.

IHG and Total Tools: 353 suppliers assessed. We assess suppliers for social impacts in two ways: Modern Slavery: 175 suppliers assessed. Responsible Timber Sourcing (encompasses harvesting practices which uphold Indigenous and local community rights and customs and exclude conflict timber): 178 suppliers assessed. TT suppliers represented within the 175 suppliers assessed for Modern Slavery. There is crossover between TT and IHG suppliers therefore this is best represented together. Regarding audit outcomes: no critical non-conformance was discovered in audits. Our Modern Slavery survey results indicated 26 high-risk suppliers across IHG and TT combined (15%). Our Timber supplier review indicated one significant potential risk (0.6%). Percentages are of those assessed, not the entire supply chain. No relationships were terminated with suppliers as a result of this assessment. Risks identified within the 26 potentially high-risk suppliers as identified in our Modern Slavery survey were inadequate risk control measures or supply from high-risk countries as identified in the Amfori BCSI. Risks identified from the Timber Sourcing review included one supplier which was using Russian feedstock during the ongoing Ukraine Invasion. We worked with this supplier to ensure this feedstock was no longer in use and sourced from countries which would not be classified as a source of conflict timber. This sourcing change resulted in compliance with our Responsible Timber Sourcing Policy and mitigated the risk of negative social impact.

GRI 415: Public Policy 2016

Disclosure	Location	Response
415-1 Political contributions		No financial or in-kind political contributions were made directly or indirectly by the organisation.

GRI 416: Customer Health and Safety 2016

Disclosure	Location	Response
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416-1

Assessment of the health and safety impacts of product and service categories

[Sustainability Report 2023 – Page 27-29](#)

Food: All Private Label Food and Liquor products are subjected to a review by a team of subject matter experts who assess whether they are safe and suitable for the consumers and their intended use.

Liquor: All own-brand products are subjected to a review by a team of subject matter experts who assess whether they are safe and suitable for the consumers and their intended use.

IHG: 100% of Private Label products, as outlined in the Private Label Supplier Manual.

Total Tools: 100% of products are signed off by the compliance manager and team, against mandatory and non-mandatory Australian standards.

416-2

Incidents of non-compliance concerning the health and safety impacts of products and services

Food and Liquor and IHG: No fines, penalties, warnings nor breaches of voluntary codes on own-brand products have been reported.

Total Tools: No incidents resulting in a fine, penalty or non-compliance with voluntary codes. One incident of non-compliance with regulations resulting in a warning. Energy Safe Victoria (ESV) analysis of one product determined the non-compliance of the applicable mandatory Australian standards. As a result a recall of the product was actioned.

GRI 417: Marketing and Labelling 2016

Disclosure	Location	Response
417-1 Requirements for product and service information and labelling	Sustainability Report 2023 – Page 27-29	<p>Food: All Private Label products are required to have detailed specification completed by the suppliers, to provide information about the product's composition, production process, allergens and suitability to vulnerable population, safe storage, usage and disposal etc. All this information is reviewed by a team of Metcash subject matter experts in the technical team, who will use it to generate product labels compliant with Food Standards Australia New Zealand requirements and any additional legislation.</p> <p>Liquor: All owned brand products are subject to compliance checks and artwork sign off before production. The allergen labelling and standard drinks and pregnancy warning information is present as prescribed by Food Standards Australia and New Zealand. All own-brand products have ARL recycling logos to educate consumers on the correct disposal options.</p> <p>IHG: All Private Label products must comply with all voluntary and mandatory labelling and compliance requirements broadly and also specific to the product category. All products must be able to perform any functionality, as labelled. Mandatory labelling is anything outlined as required by Australian Consumer Law, and voluntary labelling options include anything outside that scope and vary based on product type. Safe use of the product, and disposal of the product and environmental or social impacts may be present on products, depending on the category of the product (e.g. Private Label paint products).</p> <p>Total Tools: All products are marked with country of origin. No specific markings are added other than recycle icons according to APCO standards. All products are marked and labelled with warning labels as required. Relevant products are required to have a user manual signed off by the compliance team and meet Australian mandatory standards where required. All Total Tools exclusive brand products are assessed for compliance as required by the compliance team. Third-party risk assessments are conducted on products as required and made available to end users if required.</p>
417-2 Incidents of non-compliance concerning product and service information and labelling	Sustainability Report 2023 – Page 27-29	<p>Food and Liquor and IHG: No fines, penalties, warnings or breaches of voluntary codes on own-brand products have been reported.</p> <p>Total Tools: As disclosed in 416-2, one incident.</p>
417-3 Incidents of non-compliance concerning marketing communications		<p>Food: No escalated incidents for any shoppers/consumers within the Food pillar.</p> <p>Liquor: No non-compliance concerning marketing communications of own-brand products have been reported for Liquor.</p> <p>IHG and Total Tools: n/a</p>

GRI 418: Customer Privacy 2016

Disclosure	Location	Response
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data		No notifiable data breaches were reported to the OAIC during the reporting period. No identified leaks, thefts or losses of customer data.