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# Global Statement of Ethics

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# A message from our Chief Executive Officer


Doug McMillon, CEO

Our unique culture drives our purpose of saving people money so they can live better, and the foundation of our culture is a commitment to operating with integrity. Even as we change to meet the needs of our customers, Walmart will stay true to the values, beliefs and behaviours that have guided us over the last 50 years.

Regardless of where each of us work in our global company, this Statement of Ethics is the guide to exemplifying integrity as a Walmart associate. It is a daily resource for making honest, fair and objective decisions while operating in compliance with all laws and our policies. This Statement of Ethics applies to me, the board of directors and all associates at every level of our organization.

Through your ethical behaviour and willingness to speak up for the highest standards, we earn and keep the trust of our customers, each other and our local communities. We believe in everyday low cost and everyday low prices, but only if accomplished through our everyday integrity.

Thank you for your commitment to our Statement of Ethics. It means more than making ethical decisions; it demonstrates you care about Walmart, our reputation and our customers.



*Doug McMillon*

Doug McMillon  
President and CEO  
Wal-Mart Stores, Inc.

# Using the Statement of Ethics

Our Statement of Ethics will introduce you to the behaviours and conduct that create an honest, fair and objective workplace while operating in compliance with all laws and with our policies. It will help you recognize situations that might come up in your job which could be a violation of our company ethics. You'll also learn what to do if you have questions about what is considered ethical conduct.

## How the Statement of Ethics is Organized

- Inside the front cover, Doug McMillon, our President and CEO, points out how important it is for all of us to follow our Statement of Ethics and to report anything we feel might be a violation of those ethics.
- The next page features Our Beliefs. These are Walmart's fundamental beliefs for all conduct, including acting with integrity.
- The Introduction section explains that it is everyone's responsibility to comply with our Statement of Ethics and to report what you feel might be a violation of policy or law.
- The section Raising Concerns & Speaking Up tells you how to request an opinion before you take action and how to report what you think might be a violation of ethics, including how to make a report in private without giving your name.
- This guide gives you an overview of many, but not all, Walmart policies. Some commonly asked questions are included to help explain the policies better. There also are examples of how this Statement of Ethics and other Walmart policies apply in all countries.

## Walmart Policies & Local Laws

Walmart publishes several global policies, which are designed to give associates guidance that is the same for all locations. This Statement of Ethics is an example of a global policy. In addition, each business unit Walmart operates is expected to have a complete set of policies providing guidance to associates for the country in which they are working. Because these policies may vary by business unit or market, they are not linked to this Statement of Ethics. It is our responsibility to know all of the policies that might apply to our areas of the business. If you are not sure about the policies in your area, please talk to your manager, the Legal Department or Global Ethics.

Walmart conducts business in many countries around the world. Our associates are citizens of many countries. As a result, our operations are subject to many different laws, customs and cultures. Our operations must comply with all applicable local laws and regulations in addition to this Statement of Ethics. In some instances, the laws of two or more countries may conflict, or a local law may conflict with the Statement of Ethics. When you encounter a conflict, contact Global Ethics for guidance on how to apply the Statement of Ethics in your country.

## Contact Us

anonymously and confidentially

[walmartethics.com](http://walmartethics.com)

1-800-WM-ETHIC • 1-800-963-8442

Specific phone numbers for all countries are listed at the back of this document.

# Our Beliefs



Since Sam Walton founded our company it always has been a values-based, ethically led organization. Our beliefs are the values that guide our decisions and our leadership.

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## Respect for the Individual

We value every associate, own the work we do, and communicate by listening and sharing ideas.

## Service to our Customers

We are here to serve customers, support each other, and give to our local communities.

## Strive for Excellence

We work as a team and model positive examples while we innovate and improve every day.

## Act with Integrity

We act with the highest level of integrity by being honest, fair and objective, while operating in compliance with all laws and our policies.

## Vision Statement

The vision of Global Ethics is to promote ownership of Walmart's ethical culture to all stakeholders globally.

### Are you making the right decisions?

When faced with making any decision, you should ask yourself the following questions:

- Is it consistent with Our Beliefs?
- Would I want others to know about it?

If the answer to either question is 'no' consider whether your potential action complies with our Statement of Ethics. If it does not, identify a better plan of action. If you are unsure about a decision, talk to your manager or contact Global Ethics.

“Personal and moral integrity is one of our fundamental principles and it has to start with each of us.”

Sam Walton,  
Founder

## Who is Covered by the Statement of Ethics?

### Associates and Directors

Our Statement of Ethics applies to all associates at all levels of the organization worldwide and to all members of the board of directors of Walmart Canada. It also applies to all associates and directors of Walmart-controlled subsidiaries.

### Third Parties

Walmart expects all suppliers, consultants, law firms, public relations firms, contractors and other service providers to act ethically and in a manner consistent with this Statement of Ethics. If you hire a third party, you should take reasonable steps to ensure the third party is aware of this Statement of Ethics, has a reputation for integrity and acts in a responsible manner consistent with our standards.

## Associate Responsibilities

Every Walmart associate has a responsibility to:

- Follow the law at all times. If you see any associate violating the law, or if you are asked to do something you believe may violate the law, discuss it immediately with your manager or Global Ethics.

- Read and understand Our Beliefs and use them in your job every day.
- Learn the policies that apply to your job. No one expects you to memorize every policy, but it is good to have a basic understanding of the issues covered by each policy.
- Ask for help from your manager, Global Ethics or other Walmart resources when you have questions about the application of this Statement of Ethics or other policies.
- Immediately raise any concern you or others may have about possible requests or acts that may be a violation of this Statement of Ethics or a Walmart policy.
- Raise any ethics concerns with a manager or by contacting Global Ethics. If you raise an ethics concern through a manager and the issue is not resolved, raise it through a different manager or contact Global Ethics. The various ways to raise concerns are described in more detail later in this guide.
- Cooperate with Walmart's investigations and report all information truthfully.



## Additional Responsibilities for Management

All management associates are responsible for creating an environment that encourages compliance with our Statement of Ethics. Supervision of responsible business practices is as important as supervision of performance. To help us maintain the highest ethics, you should:

- Contact Global Ethics if you are made aware of an ethics issue covered by the Immediately Reportable Criteria on page 9 or for assistance in handling an ethics question or concern.
- Meet with your direct reports periodically to review Our Beliefs and our Statement of Ethics.
- If there is a conflict between our ethics and business objectives, ensure that our ethics always come first.
- Lead by example and encourage your associates to act with integrity in all dealings to avoid even the appearance of a violation of our ethical standards.
- If an ethics issue arises with one of your associates, make sure other associates in your area are not making the same mistake.
- Ensure open communication by encouraging associates in your department or division to ask questions concerning our Statement of Ethics.
- Never cover up or ignore any ethical conduct problem. Address the matter in a timely manner and seek guidance if necessary.

- Appreciate associates who raise issues.
- Never retaliate against anyone for raising an ethics issue, assisting in an investigation, or participating in any proceeding relating to an alleged violation of any government regulation, law or rule, or alleged fraud against shareholders.
- Once an ethical concern has been raised, do not interfere with any investigation into the matter.
- Encourage self-reporting of business conduct violations. If an associate voluntarily reports that he or she was involved in an ethics violation, self-reporting may be considered when determining the appropriate disciplinary action to be taken.

## Discipline for Violations

Appropriate disciplinary action, up to and including termination, may be taken against any associate who violates our Statement of Ethics, or applicable laws, regulations, or policies.

# Raising Concerns & Speaking Up

“Don’t compromise your reputation. It is a precious commodity. Don’t compromise your integrity... have a good name.”

Sam Walton, Founder

All of us should constantly strive to maintain a work environment that encourages associates to raise concerns about possible violations of our Statement of Ethics. Often we hear stories of other companies where employees were aware of problems, but did not feel comfortable coming forward. No one should ever feel that way at Walmart. Please report possible ethics issues immediately so they can be resolved before more serious consequences develop. Walmart prohibits retaliation against any associate who raises a concern.

## Ethics Opinions

In the normal course of business, you might have a situation in which you are not sure if your conduct violates the Statement of Ethics or not. When you have an ethics question, you are encouraged to contact Global Ethics for a verbal or written opinion before you take action.



Opinion requests may be submitted to Global Ethics under the “Request for Guidance” option at [www.walmartethics.com](http://www.walmartethics.com).

## What Happens When an Ethics Concern is Raised?

Walmart takes all reported concerns seriously. We confidentially investigate ethics allegations to determine if any law, policy or the Statement of Ethics was violated. Walmart has a compelling interest in protecting the integrity of every investigation, including protecting reporters and witnesses from harassment, intimidation and retaliation; keeping evidence from being destroyed; ensuring that testimony is honest and identifying and addressing root causes. If you report a violation, Global Ethics will make every effort to keep your identity private and to secure any data relating to the investigation. Also, Global Ethics may reasonably impose a requirement that witnesses must maintain confidentiality regarding a particular investigation and their role in it. In such cases, you must maintain confidentiality and not discuss your report or the investigative process with others. Global Ethics does not generally disclose investigation details, but you will be informed of the status of the investigation.



## Non-Retaliation

Associates who come forward with concerns play an important role in maintaining a healthy, respectful and productive workplace, as well as protecting our stakeholders. These associates help our company address problems early – before more serious consequences develop. It is important for each of us to create a work environment where everyone can raise concerns of ethics issues without fear of retaliation.

Retaliation against associates who raise concerns or questions about misconduct will not be tolerated. Concerns should be raised in good faith, which means you have made a genuine attempt to provide honest and accurate information, even if it is later proven that you were mistaken. Walmart reserves the right to discipline anyone who knowingly makes a false accusation or has acted improperly. However, if an associate voluntarily reports that they were involved in a violation, self-reporting may be considered when determining the appropriate disciplinary action to be taken.

Walmart will not terminate, demote or otherwise discriminate against associates for raising concerns. Also, it is important for colleagues not to isolate associates who have raised concerns – such associates should be treated with respect. Any change in treatment toward an associate who has raised a concern could be seen as a form of retaliation.

Walmart has an established process to deal with retaliation issues. Associates who believe they have experienced retaliation after raising an ethics concern should report the issue to their manager or Global Ethics.

## How to Raise a Concern

Walmart provides a variety of resources for you to raise a question or concern. Depending on the nature of the concern, it may be easiest to talk directly to the person responsible about your concern, providing the person with an opportunity to clarify the issue. If you don't feel comfortable talking to the person responsible, you should consult one of the resources listed below. Self-reporting is encouraged and may be taken into consideration in determining appropriate disciplinary action.

## Use the Open Door Communications process

The Open Door Communications process is the most direct way to voice any concern to a manager. If you believe your immediate manager is involved in the problem, discuss the issue with the next level of management or use one of the other resources described below.



## Contact Global Ethics

Walmart has a Global Ethics Helpline, which is available to associates around the world 24 hours a day, seven days a week, and is equipped to handle most local languages. The helpline is staffed by an organization not affiliated with Walmart, and to the extent possible (and in conformity with local regulations), callers may remain anonymous. In all cases, the privacy of the associate will be respected to the fullest extent possible under the law. The operator will relay the information to Global Ethics and will provide the associate with a case number and callback date if desired. The Immediately Reportable Criteria outlined on page 9 must be reported through these channels. Country-specific contact information is listed at the back of this document.

## Global Ethics Contact Information

### Phone

U.S.A., Puerto Rico and Canada:  
1-800-WM-ETHIC  
[1-800-963-8442]

Specific phone numbers for all countries are listed at the back of this document.

### Mail

Wal-Mart Stores, Inc.  
Attn: Global Ethics  
702 SW 8th Street  
Bentonville, AR  
72716-0860

### Internet

walmartethics.com

## Immediately Reportable Criteria

Associates may raise concerns regarding conduct that may violate our Statement of Ethics through the various channels listed in the Raising Concerns & Speaking Up section. However, there are certain types of allegations that must immediately be reported to Global Ethics.

### Bribery

- Providing, offering, promising, requesting, or receiving any improper or unearned benefit
- Any violation of the company's Global Anti-Corruption Policy or related procedures
- All suspected violations of anti-bribery laws should also be reported, including any violations of the anti-bribery restrictions in the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and the Canadian anti-corruption and anti-bribery legislation.

### Officer Misconduct

- Violations of the Global Statement of Ethics by company officers or direct reports to any company CEO

### Fraud or Theft Greater Than \$100,000 and Involving an Associate

### Incorrect Records and Accounts

- Interfering with audits or internal controls, falsifying, misrepresenting, or destroying financial records, reports, or data, or improperly concealing, altering, or manipulating financial records, reports, or data

### Information System Hacking

- Any conduct involving an associate maliciously gaining unauthorized access to company information systems

### Global Corporate Brand Reputation Risks

- Threats to human life, slave or forced labour, human trafficking, or child labour
- Serious criminal misconduct, such as:
  - Bid rigging, price fixing, market or customer division or allocation, or other anti-competitive collusion
  - Insider trading
  - Trade sanctions and export regulation violations
  - Money laundering

## Waivers

Any associate can request a waiver of the applicability of this Statement of Ethics. All requests must be submitted in writing to Global Ethics by the associate and must contain the relevant details and facts supporting the requested waiver. Global Ethics will respond in writing to the associate. Where required by law for certain executive officers or board of directors members, requests for waivers will be considered by the audit committee or the full board of directors, and approval of such waivers will be promptly disclosed to shareholders.

All waiver requests must be approved in advance of the conduct for which approval is sought.



## Non-Retaliation

**Q** I reported an allegation six months ago. Ever since, my manager has stopped including me in several meetings. Is this retaliation?

**A** Significant changes in how you are treated may be retaliation. If your manager treats you differently after reporting an allegation, you should raise your concern to management through the Open Door process or by contacting Global Ethics.

**Q** One of my associates called the Helpline and made a false claim against me. I think she did it to hurt my career. Can I give her a lower rating on her evaluation since she is obviously trying to spread lies about me?

**A** We should believe that associates who report concerns do so in good faith. Taking action against an associate because the associate reported a concern is retaliation and may result in disciplinary action for you as a manager. Retaliation will not be tolerated at Walmart. It prevents an open reporting environment and encourages a culture of fear.

**Q** Is protection from retaliation only available if I report my concerns through the Helpline?

**A** Retaliation is unacceptable no matter how you report your concern, whether through management, Human Resources or Global Ethics. If you believe you have been retaliated against, report your concern to management through the Open Door process or contact Global Ethics.

“You can overcome almost anything, but you cannot overcome a lack of integrity.”

Lee Scott,  
Former President and CEO,  
Wal-Mart Stores, Inc.

## Alcohol & Drug-Free Workplace

Walmart is committed to a safe and healthy workplace for everyone. The possession, solicitation or use of illegal drugs, or being under the influence of such drugs while at work, is

*Walmart strictly forbids improper use of drugs and alcohol.*

prohibited and will not be tolerated. Walmart strictly forbids improper use of drugs and alcohol. All associates should ensure that their performance and judgment are unimpaired by alcohol consumption during work hours. Associates should not report to work under the influence of alcohol nor should they consume alcohol on company property. In some instances, associates of the legal drinking age may consume alcoholic beverages at company-sponsored events if the consumption of alcohol is approved in advance by the country president or the corporate executive vice president for the business unit sponsoring the event. Walmart will take customary practices into consideration in countries where a moderate consumption of alcohol with a business meal is common.

## Discrimination & Harassment Prevention

One of the basic beliefs upon which Sam Walton founded our company is “respect for the individual.” Each of us is responsible for creating a culture of trust and respect that promotes a positive work environment. This means treating one another with fairness and courtesy in all of our interactions in the workplace. We are committed to maintaining a diverse workforce and an inclusive work environment. Walmart prohibits discrimination in employment, employment-related decisions, or in business dealings on the basis of an individual's race, colour, ancestry, age, sex, sexual orientation, religion, disability, ethnicity, national origin, veteran status, marital status, pregnancy or any other status protected by law or local policy. We should provide an environment free of discrimination to our associates, customers, members and suppliers.

*We believe in a positive, respectful work environment for all associates.*



*Harassment in the workplace is prohibited regardless of whether it is welcome or unwelcome.*

We believe in treating each other with respect, whether it is a co-worker, supplier, customer or anyone doing business with us.

Harassment is conduct which inappropriately or unreasonably interferes with work performance, diminishes the dignity of any person, or creates an intimidating, hostile or otherwise offensive work environment based on an individual's legally protected status. Verbal, visual, or physical conduct of a sexual nature is not acceptable in the workplace and may be determined to be sexual harassment. Examples include:

- Sexual advances, requests for sexual favours, sexually explicit language, off-colour jokes, remarks about a person's body or sexual activities;
- Displaying sexually suggestive pictures or objects, suggestive looks, leering or suggestive communication in any form;
- Inappropriate touching, both welcome and unwelcome.

We also prohibit other forms of harassment based on an individual's legally protected status, such as:

- Using slurs or negative stereotyping
- Verbal kidding, teasing or joking
- Intimidating acts, such as bullying or threatening
- Any other conduct that shows hostility toward, disrespect for, or mistreatment of an individual based on the individual's legally protected status

Harassing conduct in the workplace, such as that described above, is prohibited, regardless of whether it is welcome or unwelcome and regardless of whether the individuals involved are of the same or different sex, sexual orientation, race or other status. Again, Walmart prohibits retaliation and will not terminate, demote or otherwise discriminate against associates for reporting concerns.

## Inappropriate Conduct

We believe in maintaining a working environment free of inappropriate conduct such as obscene, profane, gross, violent, discriminatory, bullying or similarly offensive language, gestures or conduct. Walmart will not tolerate such conduct, which violates our belief of respect for the individual.

While posting information online can be a great way to connect with others, always conduct yourself online in a manner that is consistent with Walmart's ethics and Our Beliefs. Inappropriate conduct of the type described here is strictly prohibited, even if it occurs online.



## Wages & Hours

We are committed to complying fully with all applicable laws and regulations dealing with wage and hour issues, including off-the-clock work, rest breaks, meal periods and days of rest, overtime pay, termination pay, minimum-wage requirements, wages and hours of minors and other subjects related to wage and hour practices. As Walmart associates, we must:

- Comply fully with all corporate policies and procedures related to wage and hour issues
- Comply fully with all applicable laws and regulations pertaining to wage and hour issues
- Report any violations of wage and hour laws or policies through the Open Door Communication process or by contacting Global Ethics.

It is a violation of law and Walmart policy for you to work without compensation or for a supervisor (hourly or salaried) to ask you to work without compensation. You should never perform any work for Walmart without compensation.



## Conflict of Interest

### General

We have a responsibility to all our stakeholders to make decisions strictly on the basis of Walmart's interests, without regard to personal gain. A conflict of interest can arise when our judgment could be influenced, or might appear to be influenced, by the possibility of personal benefit. Even if it is not intentional, the appearance of a conflict may be just as damaging to your reputation, and Walmart's reputation, as an actual conflict. We should always be on the lookout for situations that may create a conflict of interest and do everything we can to avoid them.

It is your responsibility to tell your manager about any situation you think creates, or could create, a conflict of interest. Managers are encouraged to bring such matters to the attention of Global Ethics for advice. You may also contact Global Ethics with any question you have.

Conflict of interest situations can come up in various ways. The following sections outline some of the possibilities.

### Financial Investments

You have a responsibility to make sure that your personal financial activities do not conflict with your responsibilities to the company. A financial conflict of interest can arise when your judgment could be influenced, or might appear to be influenced, by the possibility of personal financial gain.

#### Examples of conflicting financial investments are:

- Financial interest in a supplier of Walmart, if you have direct or indirect involvement in our business with that supplier
- Receiving personal compensation from a supplier, if you have direct or indirect involvement in our business with that supplier
- Using confidential company information for personal gain

Additionally, direct ownership of stock in a competitor with a market value in excess of \$20,000 must be disclosed in writing to Global Ethics. Global Ethics will determine whether or not a conflict or a potential conflict exists and how it should be handled.

### Outside Employment

Associates should avoid employment or outside interests that may create, or give the appearance of creating, a conflict of interest. For example, management associates working for a competitor is deemed to be a conflict. Hourly associates should check with their managers before accepting employment with a competitor to determine if a conflict exists. Factors for consideration include similarity of position and job responsibilities. Similarly, associates may not work for a supplier if they have any influence (either direct or indirect) over the supplier's product or the supplier's business with Walmart.

Associates may operate and work in a side business as long as it does not create a conflict of interest with their work at Walmart. This means the side business cannot interfere with your responsibilities as a Walmart associate, be similar in nature to your role as an associate, benefit from the use of Walmart assets, supply products to Walmart or reflect negatively on Walmart.

If you have a question about whether outside employment is a potential conflict, contact your manager or Global Ethics.

### Former Employment

A conflict of interest may exist if a former associate is calling on Walmart in an area in which the associate worked or had influence while employed at Walmart. If the former associate was a Walmart officer, a conflict may exist regardless of the area in which the officer worked.

When a former associate takes a position with, or on behalf of, a supplier, Walmart will not do business with that associate for a period of one year following his or her separation, if the former associate is dealing with a business area in which he or she worked or had business influence. Walmart will not do business with former officers for a period of one year regardless of the area in which the former officer worked. Global Ethics may, in partnership with senior business leadership, determine if a different time period is reasonably warranted under the circumstances. All conflict determinations must be submitted to Global Ethics in advance for a written opinion.

## Personal Relationships with Suppliers

Associates should not have social or other relationships with suppliers if the relationship would give the perception that a business influence is being exerted. We believe in basing our relationships with suppliers on efficient, fair and lawful business practices. The selection of suppliers must be made on the basis of objective criteria, including integrity, quality, price, delivery, adherence to schedules, product suitability, maintenance of adequate sources of supply, and Walmart's

*The selection of suppliers must be made on the basis of objective criteria.*

purchasing practices and procedures. We must treat our suppliers with respect, fairness and honesty. We must not take undue advantage of a supplier by using Walmart's business influence. Also, we should expect our suppliers to follow all applicable legal requirements in their business practices, as well as our supplier standards.

If you believe you may be perceived as having an inappropriately close relationship with a supplier, or appear to be exerting a business influence on the supplier, inform your manager or contact Global Ethics.

## Gifts & Entertainment

Accepting gifts and entertainment can cause a conflict, or the appearance of a conflict, between personal interests and professional responsibility. Walmart's culture is to never accept gifts or entertainment from any supplier, potential supplier, government agent, or other third party the associate has reason to believe may be seeking to influence business decisions or transactions. Associates also may not accept a gift or gratuity from a customer for work performed by the associate in a Walmart facility, except as required by local or national policy.

We may not accept items donated to Walmart by suppliers for the purpose of raising funds for charities or non-profit organizations. Also, we should never ask for, accept or approve of suppliers making donations on behalf of Walmart. Additionally, associates should not provide a list of our suppliers to charitable organizations for the purpose of fundraising.

Our policy on gifts and entertainment stems from our values of complete transparency and objectivity and our principle of maintaining Every Day Low Costs. Since such gifts and entertainment increase the cost of doing business, we help our suppliers give us low prices on products by not expecting the gifts and entertainment they may have to spend on other customers. We recognize that, as a global company, we may encounter situations in which local practices will come into play. Global Ethics will review these situations on a case-by-case basis.

When you are establishing a new business relationship, make sure all parties are aware of our policy regarding gifts and entertainment. In some countries where gift giving is a custom or tradition, you should politely explain this policy to your customers and suppliers, especially prior to holiday gift-giving periods, in order not to create any expectations.

JUST SAY...  
**No, thank you.**



## ASK YOURSELF...

*Would this business offer me this gift or gratuity if I wasn't employed by Walmart?*

You should always be aware of how the act of accepting a gift or gratuity might be perceived by the public, by other suppliers or by other associates. When dealing with external businesses, you should ask yourself, "Would this business offer me this gift or gratuity if I wasn't employed by Walmart?" If the answer is "no" or is unclear, you should not accept it.

Occasionally, there may be times when returning a gift would be impractical or embarrassing. In those rare instances, the gift should be managed in a fair and objective manner that does not benefit you personally, such as donating it to charity. You should immediately tell your manager or Global Ethics about any gift you've been offered or received if you feel that the gift might be a violation of our policy. If you have any questions about gifts and entertainment, you should seek assistance from your manager or Global Ethics.

### Personal Relationships with Other Associates

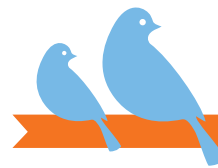
At Walmart, we want to maintain a work environment in which associates can perform effectively and achieve their full potential. We all are responsible for creating a climate of trust and respect and for promoting a productive work environment.

A conflict of interest exists when you manage someone with whom you have a family, or a romantic relationship. A family relationship includes the following relatives by birth, adoption, marriage, domestic partnership or civil union: your spouse, children, parents, siblings, grandparents or grandchildren, as well as anyone who currently is a member of your household, whether or not you are related. It also may include other close personal relationships such as godparents. Even if you are acting properly, your relationship will likely be seen as influencing your judgment. This can damage morale and disrupt workplace productivity. Therefore, you may not directly or indirectly supervise any family members or any

associate with whom you have a close personal relationship, date or are romantically involved. This includes situations in which you may be able to influence that associate's terms and conditions of employment or that associate may be able to influence the terms and conditions of your employment.

Walmart strives to eliminate personal relationships that interfere with work performance or which may constitute harassment.

You should ask for guidance from your manager or contact Global Ethics whenever an issue comes up regarding a personal relationship.



*At Walmart, we want to maintain a work environment in which associates can perform effectively and achieve their full potential.*

### Walmart Assets

We have a responsibility to our shareholders to use Walmart property and assets for Walmart business and not allow them to be used for any type of personal gain. You are responsible for maintaining Walmart property under your control and should take reasonable steps to protect it from theft, misuse, loss, damage or sabotage. Where permitted by law, associates have no expectation of privacy as to the use of Walmart communication tools (such as email or voice mail). Walmart has the right to, and does, monitor communications tools, including the content and usage of such tools.





## Alcohol & Drug Free Workplace

**Q** Is there somewhere I can go for help if I have a drug or alcohol problem?

**A** Walmart operations in some countries provide counselling services. Please contact your manager through the Open Door process, your Human Resources manager or your local substance abuse counselling centre for help.

**Q** I'm attending a Walmart-sponsored group meeting where alcohol will be served. May I drink alcohol while there?

**A** With prior approval from the market country president or corporate executive officer of the business unit sponsoring the event, alcohol may be served at some company-sponsored events. Associates of legal drinking age may consume alcohol at these events.

## Discrimination and Harassment Prevention

**Q** In the break room, another associate called me a disrespectful name associated with my nationality. What should I do?

**A** Immediately report the incident to management through the Open Door process or contact Global Ethics.

**Q** A department manager regularly comments about how attractive I am, which makes me feel uncomfortable. What should I do?

**A** We encourage you to tell the person to stop. If you are not comfortable talking to the person or the activity does not stop, immediately report the issue to management through the Open Door process or contact Global Ethics.

**Q** Is my desk calendar with occasional stereotypical and sexual jokes appropriate in the workplace?

**A** No. It could be offensive to someone else in the workplace. If you are in any doubt, remove the item from the workplace.

**Q** An associate used a word in a meeting that is offensive to me. What should I do?

**A** Speak up and tell the person if you feel comfortable to do so. Some words are universally offensive but some are not. The associate might not know that the word could be offensive to someone else. You can also exercise the Open Door process or contact Global Ethics.

## Inappropriate Conduct

**Q** A customer continues to call me bad names while in my checkout line. What should I do?

**A** Contact a member of management or Asset Protection in your store.

## Wages and Hours

**Q** My manager asks me to gather carts each evening on my way out to my car. Is this acceptable?

**A** No. You should tell your manager you have already clocked out and it is a violation of company policy for you to work off-the-clock. You should also report the issue to management through the Open Door process or contact Global Ethics.

## Conflict of Interest

**Q** I've recently invested \$10,000 in my bank's mutual fund program. The fund may invest some of the money in either competitor or supplier stock. Is this a violation?

**A** If you have no direct control over the investment strategy, it is not a violation.

**Q** Someone told me I cannot own stock in a supplier. Is this correct?

**A** Maybe. The restriction is that you may not have any direct financial interest in a supplier whose business you have direct or indirect influence over in your position at Walmart. There are no restrictions against financial interests in suppliers whose business you do not influence.

**Q** I recently joined Walmart and I own more than \$20,000 of stock in a key competitor. Must I sell this stock?

**A** You should disclose the information to your manager and Global Ethics. Global Ethics will advise you regarding any potential conflict of interest.

**Q** There's a contracting company I do business with as part of my position with Walmart. They've asked me if I know of an engineer they could hire. My son is qualified and would like to work for this company. May I refer my son for the position?

**A** No. Even though the contracting company sought your recommendation, it may appear that you are using your position with Walmart to get your son a job. That would be a conflict of interest that could compromise your reputation as a representative of Walmart.

**Q** My neighbour is one of my suppliers. He invited my family and me to a neighbourhood party. Would it be a conflict of interest if we went to the party?

**A** It is not a violation to attend as long as the party is open to the neighbourhood and you are invited because you are a neighbour, not because of your position with Walmart. Remember to ask yourself: If another supplier or other associates knew of this situation, would it appear you are giving preferential treatment to your neighbour as a supplier, or that the supplier is trying to influence you?

**Q** Our market electronics team is attending a training session hosted by a supplier to learn about a new item the supplier is launching. The supplier said we will each get a free t-shirt for attending the training. Can we accept the t-shirts?

**A** Because the t-shirts are coming from the supplier and are not related to the product or gaining an understanding of the product, the team should not accept the t-shirts. Politely decline the t-shirts and explain our standard on gifts and entertainment to the supplier.

**Q** I have been requested to speak on a panel at an event sponsored by a supplier. The supplier has offered to pay for all expenses incurred for all speakers. Is it appropriate for the supplier to cover my expenses?

**A** No. Due to our business relationship with the supplier. If you attend, Walmart should incur the costs associated with the event.

**Q** I work in Financial Services and received a birthday gift from a close personal friend who happens to be employed by a Walmart toy supplier. Can I accept the gift?

**A** In your role, you have no direct or indirect influence over the business relationship with the supplier, so it would not be a violation to accept the gift from your friend.

**Q** In my market, it is a cultural custom for suppliers to offer beverages, such as coffee, tea or soft drinks, and other small snacks during business meetings or visits to their facilities. Can I accept these refreshments?

**A** You may accept customary refreshments such as a coffee, soft drink or small snack. However, you should not accept food and beverages that would be considered a meal.

**Q** A supplier I work with has offered me two tickets to the World Cup if I pay face value for them. Can I buy the tickets?

**A** No. Although you may be paying face value for the tickets, it may not reflect the market value of the item. Some areas allow you to resell tickets, and you might be able to make a profit if you sold them. Also, this can be considered a gift of prestige, as having the opportunity to attend a coveted event such as the World Cup is not readily available to everyone.

## Walmart Assets

**Q** I have to travel often for my job. Can I use my company laptop to check my bank account online while I am travelling?

**A** Yes, as long as it does not interfere with work performance.

**Q** My manager told me that, when I travel with my laptop, I should carry it on the plane with me. Is this really necessary?

**A** Yes. When travelling with a company-issued laptop, you must carry it on the plane with you. It may not be checked with your baggage. It is necessary to protect the laptop and the information contained on it from theft, loss, misuse or damage.



“...Acting with integrity, it’s the foundation of Walmart. It’s how our company was created. It’s the expectation — the absolute.”

Mike Duke,  
Former President and CEO,  
Wal-Mart Stores, Inc.

## Fair Competition & Fair Dealing

We are committed to complying with all competition, fair dealing and antitrust laws applicable to our global businesses. These laws help protect competition to enable open markets and enhance productivity, innovation and value for customers. Our policies and actions demonstrate our interest in encouraging competition by complying with all applicable competition and antitrust laws, as well as engaging in truthful and accurate sales and marketing practices. In doing so, we will thrive as a company and continue to help our customers around the world save money and live better. For specific information on applicable laws or to seek advice, contact the Legal Department.

## Intentional Dishonesty

Striving for excellence means operating our business with high integrity and never conducting or participating in deceptive, dishonest or fraudulent activities. These activities are not only unethical, but may also be a violation of law. You should manage your particular area of business with as much transparency as possible. You also should encourage a work environment that supports the contributions of your associates and is based on our company’s ethical values and Our Beliefs. Acts of fraud or dishonesty are more likely to occur in environments with insufficient controls or unrealistic expectations. To maintain excellence in our operations, encourage transparency, honesty and realistic expectations.



## Financial Integrity & Accounting Irregularities

Walmart requires honest and accurate recording and reporting of financial information to make responsible business decisions. All financial books, records and accounts must accurately reflect financial transactions and events. They must conform to generally accepted accounting principles and to Walmart's system of internal controls. No Walmart document or record may be falsified for any reason. No undisclosed or unrecorded accounts of Walmart's funds or assets may be established for any purpose.

## Insider Trading

It is illegal to buy or sell stock or other securities on the basis of material, non-public information or inside information. Inside information is any material, non-public information a reasonable investor is likely to consider important when making an investment decision. Some common examples include periodic sales or earnings information for Walmart U.S., Walmart international or the entire company prior to the public release of such information, projections of future earnings or losses, or news of a significant event, such as a pending merger, a change in operations structure, or a change in executive management.

It is also illegal to communicate or tip inside information to others so they can buy or sell stock or other securities on the basis of such information. If you are aware of inside information about Walmart or any other company, including our suppliers or business partners, you are prohibited from trading directly or indirectly, or tipping others to trade in stock or other securities of that company. These same restrictions apply to any person living in your household or who is financially dependent upon you, as well as to any entity or securities account you may control. As Walmart associates, we all must remember to:

- Never buy or sell stock or other securities of any company while you have inside information about that company.
- Never recommend that anyone buy or sell stock or other securities of any company while you have inside information about that company.
- Never disclose inside information about Walmart to anyone outside of Walmart (including your family members), unless such information has been released to the general public or unless such disclosure has been approved by the Legal Department, and then only after the Legal Department has informed you that adequate steps have been taken to prevent misuse of the information.

- Disclose inside information to people within Walmart only on a need-to-know basis.
- Never attempt to manipulate market prices, or spread market rumours or false information.
- Never buy or sell Walmart securities while the trading window is closed if you are subject to trading windows as described in Walmart's Insider Trading policy.

If you have questions or concerns about insider trading, refer to Walmart's Insider Trading policy, contact the Legal Department or Global Ethics.

## Restrictive Trade Practices

We will not participate in any activity intended to restrain trade or promote a refusal to conduct business with customers, members or suppliers in any country where such a refusal would be in violation of applicable law. If you learn of a refusal to conduct business or any related communications regarding such a refusal, contact the Legal Department.



## Intentional Dishonesty

**Q** An industry trade association has contacted me about participating in a benchmarking study for members of their association. This seems like a good way to obtain information about our competitors. Should we participate?

**A** There is nothing wrong with participating in industry benchmarking activities. However, this should never be used as a means to obtain confidential information about competitors.

**Q** Our store has several associates who are behind on their CBLs. To avoid a late report being elevated to my manager, can I have my office associate take their CBLs and then cover the material with my associates during our team meetings?

**A** No. Having your office associate complete the CBLs of other associates would not only be an act of intentional dishonesty but also an unethical directive by the manager. This would compromise your integrity, as well as the integrity of the office associate and the associates who should be taking the CBLs. In addition, CBLs are used to ensure that our associates are appropriately trained to handle specific situations they may encounter in their jobs. If you do not allow your associates to take their assigned CBLs, you are potentially putting your associates, customers, and the company at risk.

**Q** I am applying for another job at Walmart. A requirement of the job is a college degree. I am actually due to finish my degree in a few months. Can I state that I have the degree on my resume?

**A** No. You should be honest about your qualifications when seeking a job. Misrepresenting your education, experience, certifications or licensing is a dishonest act that could potentially put our company at risk, as well as provide an unfair advantage in the candidate selection process

**Q** My manager has stated that, due to the difficulty involved in reaching the high bins in the backroom, we should acknowledge in the system that a bin audit has occurred when, in fact, it has not. What should I do?

**A** What your manager is suggesting you do is to falsify bin audits, which is not only a dishonest act but could also be detrimental to our business. By not properly conducting your bin audits, you are potentially impacting the level of customer service at the store, as well as impacting the store's ability to maintain accurate in stock levels. Additionally, your manager asked you to engage in a dishonest act. You should report this to management through the Open Door process or contact Global Ethics.

## Financial Integrity

**Q** My manager told me to mark down several items to zero but leave them on the shelves to sell because it will "help our inventory." Is this acceptable?

**A** No. The manipulation of markdowns is not only dishonest, but it also could affect the store's profitability. If you are being instructed to do this, report it to Global Ethics immediately.

**Q** An associate near me says she makes adjustments to our financial information so our "good months" will help out our "bad months." Could this be an issue?

**A** The manipulation of accounts and allowances is not only intentionally dishonest, but is also a financial integrity concern that can have serious consequences both personally and as a company. You should report this immediately to Global Ethics.

## Insider Trading

**Q** I have inside information from a publicly listed vendor about an amazing new product the company is going to launch. Can I buy that public company's stock?

**A** No. Any stock sale or purchase based on material, non-public information is considered insider trading.

**Q** Could I encourage a friend to buy that public company's stock?

**A** Encouraging others to purchase the stock would still be considered insider trading and is commonly referred to or known as "tipping." The friend would be liable for insider trading, if he or she purchased shares based on your tip, and you would be liable for insider trading for giving the tip even though you did not buy any shares of the public company's stock.

## Restrictive Trade Practices

**Q** I was told that I should boycott one of my suppliers because they conduct business in a certain country. Should I not do business with that supplier?

**A** Although restrictions are sometimes placed on certain countries and individuals, it is always best to speak to the Legal or Compliance Department before taking any action if you are instructed to boycott a supplier or country.



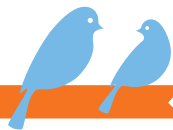
“Integrity is the single most important characteristic of a leader.”

Lee Scott,  
Former President and CEO,  
Wal-Mart Stores, Inc.

### Anti-Corruption

Walmart believes in fair, free and open markets. We also believe in promoting good government. We do not tolerate bribery, corruption or unethical practices of any kind.

*Our stance on improper benefits is firm, regardless of local practice or custom, or even harm to our business.*



Walmart strictly prohibits anyone acting on behalf of Walmart, whether directly or indirectly, from making or receiving bribes or improper payments. Walmart's Global Anti-Corruption Policy forbids us from paying, offering or authorizing payment of money (or anything that has value) to improperly influence anyone. This also applies to payments made through someone unaffiliated with Walmart, such as a third party acting on Walmart's behalf. Our prohibition also covers small or minor benefits to improperly influence someone. Our stance on improper benefits is firm, regardless of local practice or custom, or even harm to our business.

We must avoid any interaction with a public official, employee of a government publicly owned company or political organization that could even appear improper. This includes any person who exercises a public function or who works for a government at any level (e.g., customs clearance officer, members of the military and law enforcement), a political party or campaign (including unpaid staff), a public international organization (e.g., the World Bank) or a government-owned or government-controlled enterprise (e.g., employees at state-owned utilities, energy companies, hospitals). A contract with a state-owned or public entity requires prior written Legal Department approval and the approval of the Anti-Corruption Compliance team.

You must immediately report any suspected violations or any requests for a bribe. For further guidance on this topic, contact the Anti-Corruption Compliance team or Global Ethics.

## Q Anti-Money Laundering

We are committed to complying fully with all applicable anti-money laundering laws throughout the world. Some countries also have laws related to the reporting of cash or other suspicious transactions, which we must obey.

Be alert to the following activities:

- Types of payments associated with money laundering, such as: multiple money orders, volume purchases of prepaid products such as gift cards or large cash transactions
- A customer or other third party who is reluctant to provide complete information, provides false or suspicious information, or is anxious to avoid reporting or record-keeping requirements
- Unusual domestic or foreign fund transfers that indicate scam activities or fraudulent schemes
- Structuring a transaction to avoid requirements, such as conducting multiple transactions below the reportable threshold amounts

Walmart has established rules concerning acceptable forms of payment. For further guidance on this topic, please contact the Compliance Department.

## Q Authority to Work

We strive to be good corporate citizens. Therefore, we will not hire, recruit or refer for a fee, anyone not legally authorized to work in the country in which employment is sought. It is our responsibility to inspect, verify and document the identity and employment authorization of every new associate, including associates on global assignment in a country different from their home country. We also are responsible for re-verifying the continuing employment eligibility of each associate by requesting further documentation when the initial work authorization has expired.

All persons we hire or send on a global assignment to a country other than their home country, must provide proper documentation and verification of their authorization to work in the country where they are to be employed.

In complying with immigration laws, it is important that we follow our policy against employment discrimination on the basis of national origin or possible citizenship status.

We require all employment agencies, contractors and others doing business with us to fully comply with all immigration laws.



## Q Environmental Responsibility, Health & Safety in the Workplace

We all must serve as responsible stewards of the environment and care for the safety and well-being of our associates, members, customers and communities.

### Environmental Responsibility

Walmart is committed to conducting business in a socially responsible and ethical manner that protects the environment. We are committed to environmental protection and preservation of our natural resources. We also are responsible for complying with all applicable environmental laws and regulations. This responsibility is a core foundation of our commitment to environmental sustainability. We must all act ethically in regard to environmental issues to further our goal of helping people live better and to ensure a better world for generations to come.

### Health & Safety

Walmart also is committed to protecting the health and safety of our associates, members, customers, and communities because we care about each other's well-being. Conducting our business in compliance with all health and safety laws is crucial to protecting each other from harm. As associates of Walmart, we must always comply with all relevant health and safety laws and policies and never ignore a potential health and safety concern. Acting ethically in regard to health and safety issues is critical to our corporate goal of providing a safe shopping and working environment.

If you have questions regarding environmental or health and safety issues, please contact the Compliance Department or Global Ethics.

## Product & Food Safety

At Walmart, food and product safety are more than a priority or regulatory requirement; they're part of our culture. As Walmart associates, we must comply with all applicable food and product safety laws and regulations in our daily business. With thousands of suppliers around the world, we realize that we have an important obligation to require our suppliers to adhere to stringent food and product safety expectations, laws and regulations. If you have any questions or concerns regarding food or product safety and the regulations or requirements that apply to your area of the business, please contact the Compliance Department or Global Ethics.

## Protecting Personal & Business Information

In our daily business, we may be exposed to personal and business information about associates, customers, members, suppliers and our own company. It is our responsibility to protect this information in accordance with applicable laws, our policies, including our records retention requirements, and our company beliefs.

Information may be physical (on paper) or electronic. You only should collect or save company business information needed to perform your job. You must manage such information securely through its lifecycle and in accordance with Walmart's records management requirements. Confidential company information is divided into three classes of data: highly sensitive (high security), sensitive (medium security) and non-sensitive (low security).

Examples of ways to protect highly sensitive or sensitive information include:

- Accessing the information for business purposes only
- Sharing it with other associates for legitimate business purposes only
- Preventing unauthorized access (for example, locking up highly sensitive data)
- Returning all highly sensitive and sensitive information to Walmart along with any other Walmart property upon termination of employment
- If there is no business need for keeping the data and no hold for legal purposes, dispose of it by placing it in a shredder or confidential bin; never throw it in the trash

*In addition to protecting our trade secrets, it is our policy to respect the trade secrets of others.*

If you believe you have confidential company information that needs to be shared outside the company, seek approval from your manager or the Compliance Department before sharing information.

Trade secrets are an example of business data we must protect. In our pursuit of striving for excellence, we have invested in the development of systems, processes, products, business procedures and technology – our trade secrets – that have made us a leader in the retail industry and give us a competitive edge. All trade secrets are highly sensitive data and must be kept secure. In addition to protecting our trade secrets, it is our policy to respect the trade secrets of others. No associate may reveal the trade secrets of the companies with which we conduct business or companies with which they were previously employed.

All associates should ensure that their use of social media does not compromise the confidentiality of Walmart trade secrets, highly sensitive or sensitive business information.

Personal information about customers, members, suppliers and vendors must also be securely managed. Do not access or collect such information unless it is necessary to perform your job and only as directed by your manager. If you suspect there may be a breach of such personal information, notify a member of management, Human Resources or Global Ethics. Treat medical information of associates in the same way.

Specific departments within our company may have special privacy rules or procedures. We must read, understand, and stay current on, information that applies to our specific areas of the business and job functions. Additionally, we must follow the applicable records management requirements. If you have questions about the record-keeping requirements that apply to your job, please contact the Compliance Department or the Privacy Office Records Management team for assistance.

## Governmental & Political Activities

### Governmental Contracts and Inquiries

We should not enter into any contract or agreement with any governmental entity for any purpose without prior written approval from the Legal and Anti-Corruption Compliance departments. This specifically includes accepting bids, contracts or purchase orders for products and services. Failure to follow this requirement may result in Walmart incurring significant compliance obligations and related expenses.

You must immediately report all inquiries from governmental entities or investigators to your manager or contact the Legal Department. All inquiries from government entities and investigators must be answered accurately and completely.

### Political Involvement

Participation in the political process outside of work and during non-work time is admirable. You can make lawful contributions of personal funds to political activities; however, Walmart will not reimburse you for those activities unless required by law. Corporate funds shall not be provided to political candidates, entities or organizations without the express knowledge and written consent of Walmart's Corporate Affairs Department. You cannot use your job title or company affiliation in connection with personal political activities unless that information is required by law.

### International Trade

All countries regulate international trade transactions covering activities such as imports, exports and financial transactions. For example, all inbound merchandise entering the commerce of a country must clear customs prior to being released and delivered to the recipient. At customs, merchandise is examined for compliance with regulations and assessed for the payment of duties and taxes where applicable.

It is important that we all keep the following points in mind:

- Make sure a thorough check of all regulatory requirements has been performed before attempting to import and export merchandise. Regulatory requirements apply to both the merchandise and the documentation.
- Documentation must be complete and accurate, including description, prices and the parties to the transaction.

- Internal controls must be established to ensure compliance with all regulatory requirements, including any record-keeping obligations.

As a Walmart associate, you must be familiar with the various trade rules and regulations that apply to your work, including not only the trade laws of your own country, but also the laws in all other countries that may affect your work at Walmart. For example, some governments may administer a variety of trade restrictions, such as embargoes and sanctions against a number of countries, including nationals of those countries. Transactions with certain designated individuals and organizations, such as terrorist organizations, narcotics traffickers and weapons proliferators, are also prohibited even though those individuals or organizations may not be associated with any particular country's embargo. Always consult the Compliance Department prior to entering into international trade negotiations or transactions.

### Media Statements

Communication in the age of social media has changed the way we live and work. When events are unfolding or when people are simply looking for information, you may be viewed as a source of information about the company. As you talk with family members, customers and club members or participate in social media, we encourage you to share your Walmart story. If you are asked questions and are unsure of the answers, the company has created resources you may consult for the latest information, including the corporate website: <http://corporate.walmart.com>. Our associates play a critical role in sharing information with the public when unfortunate disasters occur or when communities are in need.

With regard to making public statements to media outlets such as television, news stations, local newspapers or trade publications, Walmart must ensure the accuracy of all information it provides to the public. You must receive prior written approval from the in-country or global Corporate Affairs Department before making any public statement, whether written or verbal, to such media outlets. For statements about financial matters, contact the Finance Department prior to making any statement or conducting any interview.



## Anti-Corruption

**Q** Local police officers have recently stopped trucks leaving our distribution centre and threatened to delay deliveries unless the driver pays \$50 in cash to the officer. My manager said we should carry \$50 gift cards with us. Is it permissible?

**A** No. Walmart policy prohibits all unofficial payments to government officials to influence government action. This prohibition applies to cash, gifts or other things of value. You should report this immediately to Global Ethics.

**Q** A store is seeking a permit from the local Transport Authority. The store usually gives holiday baskets to various local officials. This year, the store manager suggested including a \$300 gift card in the basket for the head of the Transport Authority. Is this acceptable?

**A** No. The policy does not allow the gift card because it is something of value and is apparently intended to influence the Transport Authority. The policy does permit certain small customary gifts, such as promotional items bearing the Walmart logo that are of low or little value and are not intended to influence anyone. However, an approval process must be followed prior to giving a gift of any kind to a government official. If you have questions about providing a gift to any government official, please contact your Anti-Corruption Compliance team or Global Ethics.

## Anti-Money Laundering

**Q** A customer refuses to provide her address for a \$3,000 money transfer to another country. Should I report this as a “suspicious person”?

**A** Any customer reluctant to provide requested information should be reported as a “suspicious person” when processing financial transactions.

**Q** A customer asked me if I could split a \$5,000 transaction into two transactions of \$2,500 so they did not have to bother with the paperwork that may otherwise be involved. Should I process the transaction this way?

**A** No. If it is truly the same transaction, it should be processed as one transaction and the proper paperwork should be completely filled out and turned in for reporting to the government. If the customer refuses to comply, contact a member of management to assist you.

## Authority to Work

**Q** Should I report suspected non-authorized workers if they’re technically employed by a contractor and not Walmart?

**A** Yes. We require all of our contractors to use only work-authorized employees at our facilities. If you suspect that there are unauthorized workers at our work sites, please report to management through the Open Door policy or contact Global Ethics.

**Q** What should I do if an associate arrives ready to begin working and they cannot show evidence of work authorization?

**A** Follow your country’s policies regarding employment authorization. This includes verification for new associates as well as visiting associates on an expatriate or transition assignment. For example, an employer must terminate the employment of an employee who is unable to show evidence of work authorization within a certain time period.

## Environmental Responsibility, Health and Safety in the Workplace

**Q** While working in the backroom, I noticed that associates were placing boxes or pallets in front of the emergency exit, blocking the door. I reported this to my manager who stated he saw no problem with the practice since it was just temporary and would be moved when the merchandise went out on the sales floor. Is this a problem?

**A** Yes. Blocking emergency exits endangers associates and customers should an emergency occur at the store. In addition, we may face potential fines and liabilities for safety hazards such as the blocking or locking of emergency exits. It is crucial that emergency exits be accessible for immediate use in the event of a fire or other emergency. You should immediately report the information to the Compliance Hotline or Global Ethics.

**Q** An associate is asked to dispose of several containers of damaged household cleaning chemicals. He knows that there is a standard operating procedure that governs the proper disposal of those kinds of items, but instead of following it, he simply moves the chemicals outside the building and leaves them there. How should this be handled?

**A** Chemicals should never be stored outside and subjected to the elements, especially if they are damaged. They may leak or deteriorate, allowing the chemicals to be released into the environment. Associates should ensure that all chemicals are stored safely in approved areas with proper containment to prevent releases into the environment. Associates should always follow corporate standard operating procedures regarding environmental issues. If an associate discovers leaking or improperly stored chemicals, he should immediately notify management and contact the Compliance Hotline or report the information to Global Ethics.

## Protecting Personal and Business Information

**Q** An invoice associate is married to a supplier who works with the buyers at the Home Office. I've seen her call her husband and tell him the cost of products we are buying from his competitors. Is this a violation?

**A** Yes. Although she does not have influence over the business he works with at Walmart, she has access to confidential information that may be giving her husband's company an advantage over other suppliers.

**Q** A co-worker of mine has recently handed in her resignation. Since then, she's been emailing supplier contact information to her home computer so she can start her own business. Is this a violation?

**A** Yes. The supplier information she obtained through her position at Walmart is considered confidential company information. She should not be using it for her personal business. You should report this to Global Ethics.

**Q** A friend of mine said he could give me information regarding a competitor's upcoming confidential advertising strategy. Should I accept the information?

**A** No. We have no desire or need to know the confidential information of other companies.

**Q** My manager told all my peers about my medical condition when I called in sick yesterday. Is that a violation of the Privacy policy?

**A** It could be. Your peers do not have a business need for knowing your medical condition. Many times this type of information is shared out of genuine care and concern for you as an important and valued member of the team. Talk to your manager and tell them your concern. If you don't feel comfortable talking to them, contact your Human Resources manager or Global Ethics.

**Q** A pharmacy associate told me that a certain customer has a rare medical condition. Is she allowed to share this information?

**A** No. Personal information about our customers, including medical data, is confidential and should not be shared. You should report the incident to management or contact Global Ethics.

**Q** I have an anonymous blog that I write on a regular basis. Can I post information I've learned in my role at Walmart?

**A** Although posting information online can be a great way to communicate with others, it is important to consider some of the risks and rewards that are involved. Maintain the confidentiality of company business information related to Walmart and its partners, and the personal information of customers, members and suppliers, as well as associate medical information. Ultimately, you are responsible for what you post.

**Q** My friend and I work in the same department. We both work with sensitive information. I recently learned confidential information that could impact her role. Can I share this information with her?

**A** No. Although the two of you are friends and work in the same department, you should not discuss or share sensitive information with anyone who doesn't have a business need to know it.

## Governmental and Political Activities

**Q** We have a representative from the government here to inspect our food products. What should I do?

**A** Contact your manager or Compliance Department immediately. Ensure that you follow the notification process for your market.

**Q** My team is interested in purchasing products from a government-owned business. What should I do?

**A** Contact your Anti-Corruption Compliance Team or Global Ethics before taking any action or making any commitment on behalf of Walmart.

**Q** My team is interested in submitting a Request for Proposal (RFP) to become the exclusive provider of food items for the local school district cafeteria program. What should I do?

**A** Contact the Legal Department before making any commitment and discuss the issue with the government contracting team.

**Q** I would like to sit on the Education Board for my city. Am I allowed to do this as a manager at Walmart?

**A** Yes. You must ensure that your position with Walmart, and any influence related to it, is kept separate from your position on the Education Board. You also should be transparent with your manager about your involvement with the board.



## International Trade

**Q** I believe that one of our imported items was classified incorrectly on the paperwork. What should I do?

**A** Contact your manager and the Compliance Department immediately. There are fines and tariffs in many countries for misclassifying import information on products.

**Q** I was told that one of my new suppliers appeared on some sort of government list and I shouldn't do business with the supplier. What should I do?

**A** Contact the Compliance Department for guidance on how to proceed or correct the issue. Many governments keep a list of countries and people with which businesses may not enter into transactions.

## Media Statements

**Q** I think my new store will be opening on a certain date. Can I call the local media to tell them about the grand opening and activities involved?

**A** You should contact the Corporate Affairs Department prior to contacting the media. Corporate Affairs will provide you with the resources and official information you may share with your local community and the media.



# Global Ethics Helpline Numbers\*

\*Numbers subject to change

Country	Contact Numbers	Country	Contact Numbers
Argentina	0800-666-1693 0800-888-0124	Japan	00531-11-5053 0066-33-11-2624 0066-33-801235 0034-800-900108
Bahrain	800-00-001+ 800-613-9668	Jordan	18-800-000 + 800-613-3728
Bangladesh	157-0011+800-613-3713	Kenya	704-973-0299
Belgium	0800-73-153	Korea (South)	00798-1-1-009-4782
Botswana, BTC	0800-600-644	Malawi	ZAIN TNM 847 MTL 8000 0847
Botswana, Orange	1144	Malaysia	1-800-81-2079
Brazil	0800-703-39-66 0800-891-4093	Mexico	001-888-280-0603 01-800-963-8422
Cambodia	1-800-881-001+800-613-3859	Namibia	0800 003 313 for Namibia Telecoms 081 91847 for MTC
Canada	1-800-963-8442 (English)	Nicaragua	1-800-0174 + 800-613-3721 001-800-226-0384 Spanish 1-800-0164 +800-613-3721
Chile	800-550707 800-104397 1230-020-0130	Pakistan	00-800-01001 + 800-613-3719
China	10-800-110-0549 400-881-1296	Peru	0800-52-346
Costa Rica	0-800-011-1246 0800-052-1581	Philippines	1-800-1-111-0073
Dominican Republic	1-888-719-1292	Puerto Rico	866-418-4024
Ecuador	1-999-119* (Andinatel)+800-451-5596 1-800-225-528* (Pacifictel)+800-451-5596 1-800-999-119* (Pacifictel Spanish)+800-451-5596	Russia	810-800-2383-1044
Egypt	2510-0200* (Cairo)+ 800-613-3723 02-2510-0200* (outside Cairo)+800-613-3723	Singapore	800-110-1517
El Salvador	800-6192 800-6918	Spain	900-99-1041
Germany	0800-182-1390	South Africa	0800-999-620 0800-203-246
Guatemala	999-91-90 + 800-613-3715 800-613-3715 1-800-835-0377	South Korea	00798-1-1-009-4782
Honduras	800-0123 + 800-613-3720 800-613-3720 800-2791-9030	Sri Lanka	2-430-430 + 800-613-3727 Outside Colombo: 112-430-430 +800-613-3727)
Hong Kong	800-90-0620	Taiwan	00801-10-4058
India	000-117 + 800-613-3704 000-800-440-2000 1800-103-9591	Thailand	001-800-11-009-4987
Indonesia	001-803-1-009-7987	United Arab Emirates	8000-121 + 800-613-3754 8000-061 + 800-613-3754 Military 8000-051 +800-613-3754
Italy	800-78-7538	United Kingdom	0800-028-7246 0800-318-405
		United States	1-800-963-8442
		Vietnam	1-201-0288 + 800-613-9679
		Zambia	(for Airtel Subscribers only) 50800 +260 978 770 682

To ask a question or report a violation, contact Walmart Global Ethics at [www.walmartethics.com](http://www.walmartethics.com) or call us at 1-800-WM-ETHIC in the U.S., Puerto Rico and Canada. For other locations, consult the end of this Statement of Ethics. Walmart **strictly forbids retaliation** against any associate who reports a concern. Reports can be made anonymously and will be treated as confidential by Walmart.



## Final Disclaimer

This Statement of Ethics provides an introduction to the responsibilities of all associates, along with an overview of certain important policies. It is an important part of your employment with Walmart; however, it is not intended to create an express or implied contract of employment in and of itself. It is also not inclusive of all applicable company policies. Furthermore, the policies of Walmart may be modified at our sole discretion, without notice, at any time. Employment with Walmart is on an at-will basis – where permitted by law – meaning that associates are free to resign at any time for any or no reason. Violations of this Statement of Ethics may result in disciplinary action up to and including termination.

## Global Ethics Contact Information

International access numbers may change. Refer to [walmartethics.com](http://walmartethics.com) for the most updated access numbers by country if you experience difficulties.



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