

Corporate Human Rights Benchmark 2020 Company Scoresheet

Company Name Walmart
Industry Agricultural, Apparel & ICT Products (Supply Chain only)
UNGP Core Score (*) 9.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
1	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
1	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
9.5	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: In November 2018, the Company published a Statement on its website, where it states: 'Walmart respects human rights; our work is guided by our values: Service to the customer; Respect for the individual; Strive for excellence; Act with integrity'. It also adds 'Governments have the responsibility to protect and uphold human rights of their citizens. Walmart respects those human rights and complies with the laws of the countries in which we operate'. [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: The Company states that 'our response to human rights issues is informed by international instruments, including, but not limited to, the United Nations Universal Declaration of Human Rights, the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights'. However, the commitment is 'informed by', which is not considered a formal statement of commitment following CHRB wording criteria. [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: ILO Core: The Company states in its Human Rights Statement: 'Our response to human rights issues is informed by international instruments including, but not limited to, the United Nations Universal Declaration of Human Rights, the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights. [...] We respect the basic rights of workers as those rights are defined under applicable law in the countries in which we operate and from which we source the products we sell. Those basic rights include freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the effective abolition of underage labor and the elimination of discrimination in respect to employment and occupation.' It is not clear, however, if the Company is committed to respect the right to freedom of association and collective bargaining in every context. It indicates that 'we recognize there are different views about freedom of association. Our view is, consistent with applicable law, that Walmart respects the rights of associates to join, for or not to join an employee association or trade union of their choice without interference'. In addition, in relation to the Commitment to the ILO Declaration, the Company indicates that it is 'informed by' it, which is not considered a formal commitment wording following CHRB criteria. [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] Not met: UNGC principles 3-6 Not met: Explicitly list All four ILO for AG suppliers: In its Standard for suppliers the Company sets out the expectations that suppliers need to respect the rights related to child labour, freedom of association, forced labour, fair employment process, health and safety and working hours. However, the commitment to respect collective bargaining is not clear. The Human rights statement described above also contains commitments in relation to suppliers. [Standard for Suppliers, 2017: cdn.corporate.walmart.com & Policies - Human Rights Statements, 10/2018: corporate.walmart.com] Not met: Explicitly list ALL four ILO for AP suppliers: See above [Standard for Suppliers, 2017: cdn.corporate.walmart.com & Policies - Human Rights Statements, 10/2018: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Explicitly list ALL four ILO for ICT suppliers: See above [Standard for Suppliers, 2017: cdn.corporate.walmart.com & Policies - Human Rights Statements, 10/2018: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: See above [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] • Met: Respect H&S of workers: The Company's statement of ethics explicitly prohibits discrimination, limits working hours and commits to the health and safety of workers. In addition to Company operations, it 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'. [Global Statement of Ethics: walmartethics.com] • Met: H&S applies to AG suppliers: In its Standard for Suppliers the Company expects that its suppliers 'Provide a safe work environment. Cultivate a safe, clean and healthy work environment [...]. Implement procedures and safeguards to prevent accident and injuries to workers [...]' More detailed requirements are set in the Standards suppliers manual. [Standard for Suppliers, 2017: cdn.corporate.walmart.com] • Met: H&S applies to AP suppliers: See above [Standard for Suppliers, 2017: cdn.corporate.walmart.com] • Not met: working hours for workers: The Statement of ethics indicates that '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'. However, no specific commitment found including amount regular working hours, overtime and rest periods, or commitment to ILO conventions on working hours. [Global Statement of Ethics: walmartethics.com] • Met: Working hours for AP suppliers: In its Standards for Suppliers the Company expects that its suppliers 'Provide compensation, benefits, working hours, breaks, rest days, holidays and leave that comply with legal requirements and applicable agreements.' More detailed requirements are set in the Standards suppliers manual: 'Working hours shall not exceed 60 hours per week, consisting of a maximum of 48 regular hours and 12 hours of overtime. [...] Overtime work should be voluntary. [...] Workers should have a minimum of 1 scheduled rest day per 7 calendar days.' [Standard for Suppliers, 2017: cdn.corporate.walmart.com] • Met: H&S applies to ICT suppliers: See above [Standard for Suppliers, 2017: cdn.corporate.walmart.com] • Not met: working hours for workers: See above [Global Statement of Ethics: walmartethics.com] • Met: Working hours for ICT suppliers: See above [Standard for Suppliers, 2017: cdn.corporate.walmart.com]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: Its Global Responsibility Report 2018 includes a 'Stakeholder Engagement' chapter, where it states: '[...] we engage stakeholders formally in periodic materiality reviews, and on going basis through numerous mechanisms [...]' In this section the Company describes some initiatives with different stakeholders, which include Communities, Associates (employees), suppliers. [Global Responsibility Report 2018, 2018: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: The Company indicates in its ESG report that 'As part of our work to develop our Human Rights Statement, we convened a cross-functional Steering Committee as well as a Working Group who: [...] Reviewed stakeholder feedback from research and consultations'. However, it is not clear if affected stakeholders participates regularly in design or monitorization of human rights approach. [2019 ESG report, 8/5/2019: corporate.walmart.com]
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AG suppliers to remedy impacts • Not met: Work with AP suppliers to remedy impacts • Not met: Work with ICT suppliers to remedy impacts

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: The Company states the following: 'Our ethics, compliance and risk committees have proven to be an effective tool to keep our leaders throughout the company involved in that work. Walmart's most senior executives are members of the company's Global Ethics, Compliance, and Risk Committee. We meet regularly— more than quarterly, and over 40 times since 2012. We discuss current issues related to ethics, compliance, and other enterprise-level risks. We structure the meetings to ensure follow-up and accountability for our action items. Each of Walmart's retail markets has its own similar committee. These committees correspondingly consist of the market's senior management and its ethics and compliance leaders, including both the market CEO and the market Chief Ethics and Compliance Officer. The open and continuous dialog created by these committee discussions has kept our management teams active in managing our risks and developing our culture.' In addition, in its Human Rights Statement, the Company indicates: 'The work is overseen by company executives and led by a cross-functional team, relying upon and developing standards, programs and practices, training and reporting.' [Reflecting on What We've Built: Walmart's Global Ethics & Compliance Program, 2017: cdn.corporate.walmart.com & Policies - Human Rights Statements, 10/2018: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for AG in supply chain • Not met: Day-to-day responsibility for AP in supply chain • Not met: Day-to-day responsibility for ICT in supply chain
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: The Company indicates in its Human Rights Statement the following: 'We identify our salient human rights priorities based on relevance to our company purpose, key categories and markets; the scale and severity of the potential human rights risk; and Walmart's ability to make a difference'. However, no further information found describing if the Company is carrying out (or has carried out) a process to identify its human rights risks and impacts. [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] • Not met: Identifying risks in AG suppliers • Not met: Identifying risks in AP suppliers • Not met: Identifying risks in ICT suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification: See above [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] • Not met: In consultation with stakeholders: See above [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] • Not met: In consultation with HR experts: See above [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company indicates in its Human Rights Statement the following: 'We identify our salient human rights priorities based on relevance to our company purpose, key categories and markets; the scale and severity of the potential human rights risk; and Walmart's ability to make a difference. [...] We have also taken into consideration input from relevant internal and external stakeholders and experts.' However, no further information found describing the assessment process. [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] • Met: Public disclosure of salient risks: The Company discloses the following salient human rights issues in its ESG report: 'Treating workers with respect; Promoting a safe & healthy work environment; Providing a fair & inclusive work environment; Combating forced & underage labor'. Each of these contains key aspects, which include pay and working hours, freedom of association and collective bargaining, debt bondage, etc. [2019 ESG report, 8/5/2019: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in AG supply chain • Not met: Including in AP supply chain • Not met: Including in ICT supply chain • Met: Example of Actions decided: On its website section 'Our Commitment to the Workers of Bangladesh', the Company describes its conclusions and actions taken on the safety of workers in Bangladesh ready-made garment factories, as a result of an assessment: 'We are particularly encouraged by the role of training in promoting factory safety in Bangladesh. An independent assessment performed by the University of Texas Health Science Center at Houston School of Public Health found that Alliance training led to an improvement in factory workers' knowledge and awareness of fire safety, that workers have a much better understanding of fire hazards and their role in emergencies and evacuations, and that an overwhelming majority of workers liked the content and delivery of the trainings they received', 'Factory remediation in Bangladesh included upgrading electrical systems, installation or upgrading of fire suppression systems, installation of fire doors, construction of additional staircases and installation of alarm systems', 'We believe sustainable, long-lasting improvements in the global supply chain can be achieved in part through proactive programs that empower workers and build factory and supplier capacity. Capacity building programs we have helped implement in Bangladesh include: The Women in Factories Training Program [...], Environmental, Health and Safety (EHS) Academy in Bangladesh'. [Our Commitment to the Workers of Bangladesh, 01/2019: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: See indicator B.2.1 • Not met: Comms plan re assessing risks: See indicator B.2.2 • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers • Not met: Including AP suppliers • Not met: Including ICT suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company's statement of ethics indicates all workers can access an anonymous and confidential global helpline (and provides a list of phone numbers per country and a website available in 14 languages). [Global Statement of Ethics: walmartethics.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: As a member of the Alliance for Bangladesh Worker Safety, Walmart's supplier facilities in Bangladesh also have access to the Alliance Helpline, Amader Kotha. On its website, it publishes monthly statistics. However, these statistics do not correspond to the Company's global grievance system, only the ones in Bangladesh. [Alliance Worker Helpline: bangladeshworkersafety.org] • Met: Channel is available in all appropriate languages: See above [Global Statement of Ethics: walmartethics.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Expect AG supplier to have equivalent grievance systems: In its Standards for supplier the Company indicates that the suppliers have to 'provide a mechanism for workers to report concerns to management, to you, to the government, to appropriate third parties and to Walmart without fear of reprisal.' [Standard for Suppliers, 2017: cdn.corporate.walmart.com] • Met: Opens own system to AG supplier workers: The Company's Global Ethics Helpline is available to 'all of our stakeholders to contact Global Ethics with questions or to voice their ethics concerns. Stakeholders include our associates, customers, shareholders, suppliers, and other companies and individuals with whom we do business'. It also includes in its Standards for supplier a requirement 'to post Walmart-approved posters in production facilities letting workers know what we expect of our suppliers and their facilities on topics like wages and hours, safety, fair treatment, and forced labour.' The posters also provide workers with information on a number of options for raising concerns, including by contacting Walmart directly in their preferred language. [Ethics Concerns FAQs, N/A: walmartethics.com & Facility Posters, N/A: corporate.walmart.com] • Met: Expect AP supplier to have equivalent grievance systems: See above [Standard for Suppliers, 2017: cdn.corporate.walmart.com] • Met: Opens own system to AP supplier workers: See above [Ethics Concerns FAQs, N/A: walmartethics.com & Facility Posters, N/A: corporate.walmart.com] • Met: Expect ICT supplier to have equivalent grievance systems: See above [Standard for Suppliers, 2017: cdn.corporate.walmart.com] • Met: Opens own system to ICT supplier workers: See above [Ethics Concerns FAQs, N/A: walmartethics.com & Facility Posters, N/A: corporate.walmart.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company indicates in its Human Rights Statement: 'While there exist a variety of mechanisms—including those offered by governments—to raise and seek redress of actual or perceived human rights concerns, Walmart also has developed its own grievance mechanisms to enable workers, customers, workers in the supply chain, communities where we operate and other stakeholders to be heard and be given proper consideration. These mechanisms include, but are not limited to, our anonymous ethics hotlines and longstanding Open Door Communications Policy for associates, and the internal structures that support resolution of each issue raised. We encourage stakeholders to raise concerns and to report activities they suspect may contravene the values and positions we express in this statement or any Walmart policy. We will not retaliate against any party for raising concerns in good faith.' [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Global Ethics Helpline, which is available online to all stakeholders. There's the possibility to choose between approximately 20 languages. [Ethics Concerns FAQs, N/A: walmartethics.com] • Not met: Expects AG supplier to have community grievance systems • Not met: AG supplier communities use global system • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system
C.7	Remedying adverse impacts and incorporating lessons learned	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: Although the Company did not have production at Rana Plaza at the time of the tragedy, 'Walmart believes in stepping up and helping, which is why Walmart and the Walmart Foundation together contributed \$3 million to BRAC, a global NGO based in Bangladesh, to support those affected by Rana Plaza and other disasters' [Our Commitment to the Workers of Bangladesh, 01/2019: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: The Company participated in the Alliance for Bangladesh Worker Safety, which provided training which 'led to an improvement in factory workers' knowledge and awareness of fire safety, that workers have a much better understanding of fire hazards and their role in emergencies and evacuations, and that an overwhelming majority of workers liked the content and delivery of the trainings they received.' Figures regarding safety awareness are provided, both pre- and post-training. For example: 'Feel unsafe in the factory in which they work most of the time: 25% before training, 6% after training', 'Would talk to their supervisors about safety concerns: 75% before training, 94% after training'. Additionally, 'Factory remediation in Bangladesh

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>included upgrading electrical systems, installation or upgrading of fire suppression systems, installation of fire doors, construction of additional staircases and installation of alarm systems'. [Our Commitment to the Workers of Bangladesh, 01/2019: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Two former Wal-Mart employees filed a class action lawsuit in federal court in Illinois alleging that the Company refused to treat pregnant women like other disabled workers, as federal and state laws require. • Area: discrimination • Story: In May 2017, two former Wal-Mart employees filed a class action lawsuit in federal court in Illinois alleging that the Company refused to treat pregnant women like other disabled workers, as federal and state laws require, according to Reuters. One of the plaintiffs said she was fired after being injured carrying a heavy tray on the job and inquiring about the Company's policy toward pregnant workers, while another stated that she was reprimanded for asking co-workers to do heavy lifting for her, forced to go out on unpaid leave and paid USD 2.00 an hour less when she returned to work. <p>The workers claim that until 2014, the Company's policy denied pregnant workers the same accommodations as other disabled employees in violation of a federal law requiring employers to treat pregnancy as a temporary disability and make appropriate adjustments. Nearly 50,000 female workers might have been affected by Wal-Mart's former policy. On September 24, 2018, the JDSUPRA website reported that the U.S. Equal Employment Opportunity Commission (EEOC) charged in a lawsuit that Walmart violated federal law when it refused to accommodate workers' pregnancy-related medical restrictions. According to the EEOC's lawsuit, Alyssa Gilliam and a class of pregnant employees at Walmart's Distribution Center were disallowed from taking part in a company program that accommodated other workers' restrictions.</p> <p>According to the investigation conducted by the EEOC, it is indicated that WalMart had a robust light-duty program that allowed workers with lifting restrictions to be accommodated. But Walmart deprived pregnant workers of the opportunity to participate in its light-duty program, explained Julianne Bowman, the EEOC's district director in Chicago.</p> <p>On October 17, 2019, it was reported that Walmart has agreed to pay USD 14 million to settle the lawsuit. The agreement will provide relief to about 740 employees in two separate settlement classes but the company admitted no wrong-doing.</p> <ul style="list-style-type: none"> • Sources: [Company website -: abetterbalance.org][Reuters - 21/09/2018: reuters.com][Bloomberg Law - 6/12/2019: news.bloomberglaw.com]
E(1).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: In a statement the Company denied the women's claims and said Wal-Mart's pregnancy policies "have always fully met or exceeded both state and federal law." The Company reported that a separate anti-discrimination policy it maintains has long listed pregnancy as a protected status. [response to allegation on discrimination against pregnant women: https://abetterbalance.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company's statement of ethics explicitly prohibits discrimination. In addition to Company operations, it applies to 'all suppliers, consultants, law firms, public relations firms, contractors and other service providers'. In addition, it has put in place initiatives related to empowering women but has not committed to respecting women's rights. [Global Statement of Ethics: walmartethics.com] • Met: Policies apply to the type of business relationships involved: See above [Global Statement of Ethics: walmartethics.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not met: Policies address the specific rights in question: In October 2017, Walmart revised its policies to allow employees who are pregnant, breastfeeding or recovering from childbirth to ask for job adjustments, reasonable accommodations or a temporary transfer to a different position. It has not however, provided information on 'points' lost or not by employees not able to finish a shift if they have to be taken to hospital. [policy on maternity leave: one.walmart.com]
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Denies allegations, but has engaged affected stakeholders: The company denies the allegations - Walmart spokesman Randy Hargrove told NPR the Arkansas-based company denies the allegations and contends "this case is not suitable for class treatment." "Walmart is great place for women to work. We do not tolerate discrimination, and we support our associates by providing accommodations every day across all of our stores, clubs, distribution centers and offices," he said. "Our accommodations policy has been updated a number of times over the last several years and our policies have always fully met or exceeded both state and federal law and this includes the Americans with Disabilities Act and the Pregnancy Discrimination Act". Though the company reached an agreement regarding the lawsuit, CHRB does not consider this as engagement and as it admitted to no wrongdoing, it is still denying the allegations Not met: Denies allegations, but reviewed systems to prevent such impacts <p>Score 2</p> <ul style="list-style-type: none"> Not met: Denies allegations, but implements review recommendations
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> Headline: Walmart urged to clean up sexual abuse and harassment of female workers in its supply chain Area: Discrimination Story: In May 2018, a global coalition of trade unions, worker rights and human rights organizations published reports on Gender Based Violence among supply chains in Bangladesh, Cambodia, India, Indonesia, and Sri Lanka. It is based on interviews with more than 215 workers employed in 21 factories that supply to Gap, H&M and Walmart. The reports revealed a range of human rights violations, focusing on women who work in supply chains. <p>In Bangladesh, women employed in Gap, H&M and Walmart supplier factories reported that it is common for supervisors and managers to pursue sexual relationships with women workers by offering benefits including salary increases, promotions, and better positions. In addition, there is the risk of sexual harassment from male mechanics tasked with fixing their machines. In Indonesia, women employed by a Gap supplier factory report male mechanics demanding sexual favours in return for fixing their machines which they need to meet their work targets. Women working for a H&M supplier factory In Sri Lanka report that they are particularly vulnerable to sexual harassment by their supervisors when they stand in line to clock-in and clock-out using biometric fingerprinting machines. Furthermore, the report states that there were 4 cases of sexual violence, including rape, in Walmart supplier factories in Cambodia. In addition, Workers from four Walmart supplier factories in Gurugram (Gurgaon), India reported that women are routinely fired from their jobs during their pregnancy. Permanent workers report being forced to take leaves without pay for the period of their pregnancy.</p> <ul style="list-style-type: none"> Sources: [Reuters, 25/05/18: reuters.com][Quartz, 01/06/2016: qz.com][The Fashion Law, 18/07/18: thefashionlaw.com][Global Labour Justice, 31/05/16: globallaborjustice.org]
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Public response available: The Company states that "We are aware of the report and are reviewing its findings. The allegations in the report are concerning, and we welcome the opportunity to identify areas for improvement." [Response to the report on gender based violation, 06/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Response goes into detail [Response to the report on gender based violation, 06/2018: business-humanrights.org]
E(2).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Company policies address the general issues raised: The Company states in its Human Rights Statement: 'We respect the basic rights of workers as those rights are defined under applicable law in the countries in which we operate and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>from which we source the products we sell. Those basic rights include freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the effective abolition of underage labor and the elimination of discrimination in respect to employment and occupation.' [Policies - Human Rights Statements, 10/2018: corporate.walmart.com & Global Statement of Ethics: walmartethics.com]</p> <ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: The policy also applies to the Company's business partners. [Global Statement of Ethics: walmartethics.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: With regard to women's rights, the Company indicates: 'Be aware of indicators of involuntary labor and actively address them, particularly where your workforce includes vulnerable populations, such as migrants, women and young people'. However, there are no guidelines related to the provision of equal pay for equal work, and measures to ensure equal opportunities throughout all levels of employment and eliminate health and safety concern that are particularly prevalent among women workers. [Standard for Suppliers, 2017: cdn.corporate.walmart.com]
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies. • Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company improving the system or engaging with stakeholders followed by the case.
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Ebay, Walmart and Amazon allegedly sell Turkmenistan cotton products • Area: Forced labour • Story: On the 19th February, 2019, Apparel Insider reported that products made with cotton that was picked using forced labour have been found on Amazon, Walmart and ebay. In May 2018, US Customs and Border Protection (CBP) banned the import of any products containing cotton from Turkmenistan due to the country's systematic use of state-sponsored forced labor during the annual cotton harvest. <p>According to Cotton Campaign (part of International Labour Rights Forum), To harvest cotton, the Turkmen government forces tens of thousands of citizens to pick cotton each year. Authorities force public sector workers, including teachers, doctors, nurses, and staff of government offices to pick cotton, pay a bribe, or hire a replacement worker, under threat of losing their job. Despite national laws prohibiting child labor and a 2008 ban of child labor in the cotton sector, children continue to do the hazardous field work, because the government maintains the cotton production system. Children pick cotton for their parents, who are forced by the government to fulfill individual cotton picking quotas under threat of losing their jobs.</p> <p>Researchers from the International Labour Rights Forum found cotton hand towels advertised as "made in Turkmenistan" on the websites of Amazon, Walmart, and eBay which raised legitimate questions about the Companies' social standards in supply chain. The International Labor Rights Forum said none of retailers are directly importing or selling the products, but instead they were allowing third-party sellers access to their e-commerce platforms in exchange for a cut of the sales proceeds.</p> <ul style="list-style-type: none"> • Sources: [Apparel Insider - 19/02/2019: apparelinsider.com][Cotton Campaign - 1/2/2020: cottoncampaign.org][Business and Human Rights Resource Center - 18/02/2019: business-humanrights.org][
E(3).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: Walmart responded the allegation regarding Turkmen cotton via the public platform Business and Human Rights Resource Center (BHRRC). The Company sent the following answer: 'Thank you for your

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>inquiry and a chance to respond to allegations that Walmart sells goods made with Turkmen cotton produced with forced labor. When we were contacted by the Thomson Reuters Foundation, we let them know we take allegations of forced labor seriously, and we would look into their inquiry, which we did. Walmart does not sell these items directly. Rather, there were some items sold by third party sellers on our online marketplace, and we removed these seller's products that were made with Turkmen cotton from the site'. [Business & Human Rights Resource Center, 18/02/2019: business-humanrights.org & Apparel insider, 19/02/2019: apparelinsider.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: Although the Company provided a response to BHRRC, and states that 'We take a whole systems approach to worker dignity, not just at Walmart, but for the benefit of the entire global supply chain'. Walmart did not provided any further details concerning the aspects of the allegation [Business & Human Rights Resource Center, 18/02/2019: business-humanrights.org & Apparel insider, 19/02/2019: apparelinsider.com]
E(3).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company states it respects 'the basic rights of workers as those rights are defined under applicable law in the countries in which we operate and from which we source the products we sell. Those basic rights include [...] the elimination of all forms of forced or compulsory labor'. [Policies - Human Rights Statements, 10/2018: corporate.walmart.com] • Met: Policies apply to the type of business relationships involved: In its Standard for suppliers the Company sets out the expectations that suppliers needs to exclude involuntary labor including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor from your operations and supply chain. [Standard for Suppliers, 2017: cdn.corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: In its Standards for suppliers, Walmart states that suppliers needs to 'allow workers freedom of movement—do not keep workers' personal identity documents or other valuable possessions, do not control workers' freedom of movement by virtue of debts owed to you, brokers, or other third parties that cannot be reasonably repaid, and allow workers to terminate employment on reasonable notice. [Standard for Suppliers, 2017: cdn.corporate.walmart.com & Policies - Human Rights Statements, 10/2018: corporate.walmart.com]
E(3).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: Although the Company states in its answer to the allegation that 'Walmart is recognized as a leader in programs and policies that support the dignity of workers in our supply chain, and a key tenet of that commitment is working in a focused and collaborative way to help reduce forced labor in the global supply chain', the Company did not provide any further evidence that has engaged in dialogue with affected stakeholders in the allegation neither that it encourages its business relationship to do so. [Business & Human Rights Resource Center, 18/02/2019: business-humanrights.org] • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders: The Company discloses that 'through complementary philanthropic efforts that have widely shareable outputs, the Walmart Foundation has funded prevalence studies on forced labor, funded offices and programs to advance the fight against forced labor and funded awareness and training programs with NGOs like International Justice Mission, Issara Institute, Polaris Project and Pacific Links Foundation to understand the forced labor landscape and migration patterns in order to develop interventions for industry wide solutions. We take a whole systems approach to worker dignity, not just at Walmart, but for the benefit of the entire global supply chain'. However, there is no evidence that the Company provided remedy to the affected people in this allegation. [Business & Human Rights Resource Center, 18/02/2019: business-humanrights.org] • Not met: Has reviewed management systems to prevent recurrence <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Headline: Crushing Debt Bondage Poses Forced Labor Risk for U.S. Port Truckers and Retailers using them • Area: Forced labour

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Story: A 2017 investigation by USA Today alleged that truck drivers in the US supply chain for retailers including Costco (Target and Home Depot) were often trapped in debt bondage and worked in conditions equivalent to forced labour. Specifically the drivers were said to be pressed into leasing trucks they could not afford, forced as a result to drive for up to 20 hours a day for pay that "sometimes drops to pennies on the hour", before being fired and having their vehicles taken, without compensation for the money the drivers had paid towards buying them. In 2018, the city of Los Angeles filed three lawsuits against some of the trucking companies named in the report. • Sources: [Huffington Post, 21/11/2017 -: huffingtonpost.com][USA Today, 16/06/2017 -: usatoday.com][Naples Daily News, 09/01/2018 -: eu.naplesnews.com]
E(4).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: According to a press article, Walmart 'pledged in a letter responding to senators that it would cancel contracts with any trucking company that did not provide "assurances" it was following fair labor practices'. [Story on truckers: money.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(4).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Company policies address the general issues raised: The Company has a standard for suppliers manual which sets out the expectations that suppliers need to respect the rights related to non-discrimination, child labour, freedom of association and collective bargaining, forced labour, health and safety and working hours. However, a policy on bonded labour specifically was not found. • Met: Policies apply to the type of business relationships involved: he Company includes the following in its Standard for Suppliers: 'Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor—from your operations and supply chain.' [Standard for Suppliers (website): corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: Additionally, the Standard for Suppliers states that suppliers must 'Allow workers freedom of movement—do not keep workers' personal identity documents or other valuable possessions, do not control workers' freedom of movement by virtue of debts owed to you, brokers, or other third parties that cannot be reasonably repaid, and allow workers to terminate employment on reasonable notice. ' [Standard for Suppliers (website): corporate.walmart.com]
E(4).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> • Headline: Investigation reveals 'numerous' labour abuses in garment factories linked to major brands • Area: Working Hours • Story: In late 2018, a special report on garment factories in Ethiopia highlighted verbal abuses, labour abuses, poor working conditions, unpaid or forced overtime, docked wages for minor infractions, and wages well below the living wage for textile workers. At one of the facilities, MAA Garment and Textiles, Kebire Enterprises Plc. (MAA) factory in the town of Mekelle, reports alleged used excessive wage deductions for minor disciplinary transgressions, ignorance of rules and laws banning forced overtime, mandatory overtime for workers, and collapsing of workers due to overworking and other factors. Additionally, managers have compelled women workers to provide sexual favours in return for promotions. The MAA factory has produced goods for retailers such as H&M and WalMart. • Sources: [Workers Rights Consortium - 31/12/2018: business-humanrights.org][Quartz Africa - 08/05/2019: qz.com][Reuters - 16/04/2019: reuters.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(5).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The company states that it is reviewing the allegations and will engage its suppliers as needed. [Walmart's Response, 13/05/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(5).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company states it respects 'the basic rights of workers as those rights are defined under applicable law in the countries in which we operate and from which we source the products we sell. Those basic rights include [...] the elimination of all forms of forced or compulsory labor'. The company also states that its supplier standards require its suppliers to "comply with all applicable laws and agreements regarding compensation and working hours...and provide a safe working environment." [Policies - Human Rights Statements, 10/2018: corporate.walmart.com & Responsible Buying Practices: corporate.walmart.com] • Met: Policies apply to the type of business relationships involved: The company states that it accepts third party audits for its suppliers' facilities, which include working hours and facility health and safety standards. It also states that its standards and policies are "regularly reviewed by our Governance team to meet the demands of our changing business and potential risk areas." Walmart requires suppliers to post Walmart-approved posters in production facilities that cover topics like wages and hours. [Responsible Buying Practices: corporate.walmart.com & Responsible Sourcing: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question
E(5).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: There is no evidence to suggest that the company has engaged with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: There is no evidence to suggest that the company has encouraged its suppliers to engage with affected stakeholders. • Not met: Provides remedies to affected stakeholders: There is no evidence to suggest that the company has provided remedies to affected stakeholders. • Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that the company has reviewed management systems to prevent recurrence. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There is no evidence to suggest that the company has provided remedies that are satisfactory to the victims. • Not met: Has improved systems and engaged affected stakeholders: There is no evidence to suggest that the company has improved systems and engaged affected stakeholders.
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> • Headline: Twelve Tribe's Common Sense Farm linked of child labor in Cambridge, US • Area: Child labour • Story: The New York State Department of Labor found multiple violations of state child labour laws and abuse occurring at the Common Sense Farm in Washington County, New York, USA. The farm and production center location of religious sect 'Twelve Tribes' supplies soaps and skincare products to supermarkets including Walmart, Target, Amazon and Whole Foods. • Sources: [Times Union - 06/06/2018: timesunion.com] [Inside Edition - 01/06/2018: insideedition.com]
E(6).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: Wal-Mart's response to Inside Edition stated that the company has blocked the product from its website while they investigate. [Inside Edition story on child labour in NY: insideedition.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The company has not provided a detailed response to the allegation.

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(6).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: Walmart's human rights policy states: "We respect the basic rights of workers as those rights are defined under applicable law in the countries in which we operate and from which we source the products we sell. Those basic rights include freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the effective abolition of underage labor and the elimination of discrimination in respect to employment and occupation." [Walmart Policies and Guidelines: corporate.walmart.com] • Met: Policies apply to the type of business relationships involved: In its standard for suppliers the company sets out the expectations that suppliers need to respect the rights related to child labour, freedom of association, forced labour, fair employment process, health and safety and working hours. [Standard for Suppliers, 2017: cdn.corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: There is no evidence that Walmart has a specific age verification process. [Standard for Suppliers, 2017: cdn.corporate.walmart.com & Walmart Policies and Guidelines: corporate.walmart.com]
E(6).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: There is no evidence to suggest that Walmart has engaged with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: There is no evidence to suggest that Walmart has encouraged linked businesses to engage with affected stakeholders. • Not met: Provides remedies to affected stakeholders: There is no evidence to suggest that Walmart has provided remedies to affected stakeholders. • Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that Walmart has reviewed management systems to prevent recurrence. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There is no evidence to suggest that Walmart has provided remedies to victims. • Not met: Has improved systems and engaged affected stakeholders: There is no evidence to suggest that Walmart has improved systems and engaged affected stakeholders.
E(7).0	Serious allegation No 7		<ul style="list-style-type: none"> • Headline: Supply chain of Tesco, Asda, Waitrose, and others linked to forced labor in the UK • Area: Forced labour • Story: A number of supermarkets in the UK have been accused of being supplied fresh produce from exploited slave labour. The companies include Tesco, Asda (subsidiary of Walmart), Waitrose and others. The operation was uncovered by the anti-slavery charity Hope for Justice and an official police investigation was launched in February 2015. The gang that provided the labour is accused of promising over 400 ex-cons and alcoholics in Poland good money for moving to England to work, but instead make less than 50p per day and live in subpar conditions. 'According to an investigation by the Times all of the supermarket and firms involved claim they knew nothing about the exploitation of the workers. There is also no suggestion any of the companies were complicit.' Following two trials, five men and three women have been convicted of modern slavery offences, and seven of those have been convicted of money laundering. They were sentenced at the Birmingham Crown Court on 5 July. • Sources: [The Sun - 07/07/2019: thesun.co.uk][BBC News - 05/07/2020: bbc.com]
E(7).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: There is no known response from the company <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(7).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company states it respects 'the basic rights of workers as those rights are defined under applicable law in the countries in which we operate and from which we source the products we sell. Those basic rights include [...] the elimination of all forms of forced or

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>compulsory labor'. [Policies - Human Rights Statements, 10/2018: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: The Company includes the following in its Standard for Suppliers: 'Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor—from your operations and supply chain.' [Standard for Suppliers, 2017: cdn.corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: Additionally, the Standard for Suppliers states that suppliers must 'Allow workers freedom of movement—do not keep workers' personal identity documents or other valuable possessions, do not control workers' freedom of movement by virtue of debts owed to you, brokers, or other third parties that cannot be reasonably repaid, and allow workers to terminate employment on reasonable notice. ' [Standard for Suppliers, 2017: cdn.corporate.walmart.com]
E(7).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence • Not met: Denies allegations, but has engaged affected stakeholders • Not met: Denies allegations, but reviewed systems to prevent such impacts <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders • Not met: Denies allegations, but implements review recommendations • Not met: Denies allegations, and ensures systems prevent such impacts

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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