

Company Name Walmart Inc
Industry Agricultural Products & Apparel (Supply Chain only)
Overall Score (*) 22.7 out of 100

Theme Score	Out of	For Theme
1.5	10	A. Governance and Policies
3.8	25	B. Embedding Respect and Human Rights Due Diligence
5.4	15	C. Remedies and Grievance Mechanisms
2.9	20	D. Performance: Company Human Rights Practices
5.5	20	E. Performance: Responses to Serious Allegations
3.6	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2019 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <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, Nov 2018: corporate.walmart.com] Score 2 <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, Nov 2018: corporate.walmart.com] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <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,

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			<p>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. [Global Statement of Ethics: walmartethics.com & Policies - Human Rights Statements, Nov 2018: corporate.walmart.com]</p> <ul style="list-style-type: none"> • 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: cdn.corporate.walmart.com & Policies - Human Rights Statements, Nov 2018: corporate.walmart.com] • Not met: Explicitly list ALL four ILO for AP suppliers: See above [Standard for Suppliers: cdn.corporate.walmart.com & Policies - Human Rights Statements, Nov 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 [Global Statement of Ethics: walmartethics.com & Policies - Human Rights Statements, Nov 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: cdn.corporate.walmart.com] • Met: H&S applies to AP suppliers: See above [Standard for Suppliers: 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: cdn.corporate.walmart.com & Standard for Suppliers Manual (no longer valid), 2014: cdn.corporate.walmart.com]
A.1.3.AG.a	Commitment to respect human rights particularly	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Respect land ownership and natural resources • Not met: Respecting the right to water

Indicator Code	Indicator name	Score (out of 2)	Explanation
	relevant to the industry - land and natural resources (AG)		<ul style="list-style-type: none"> • Not met: Expecting suppliers to respect these rights [Standard for Suppliers: cdn.corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: IFC Performance Standards [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: FPIC for all [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Zero tolerance for land grabs [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people’s rights (AG)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's rights: The Company has put in place initiatives related to empowering women such as 'Women's Economic Empowerment', 'Catalyst CEO Champions for Change Pledge' or 'Passion for Parity'. However, no evidence found of a formal commitment to respect women’s rights. [Women's Economic Empowerment (Website): corporate.walmart.com & Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Children's rights • Not met: Migrant worker's rights • Not met: Expects suppliers to respect these rights Score 2 <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's Rights: The Company has put in place initiatives related to empowering women such as 'Women's Economic Empowerment', 'Catalyst CEO Champions for Change Pledge' or 'Passion for Parity'. However, no evidence found of a formal commitment to respect women’s rights. [Women's Economic Empowerment (Website): corporate.walmart.com & Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights Score 2 <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <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] Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: The Company indicates that 'our response to human rights issues is informed by [...]. we have also taken into consideration input from relevant internal and external stakeholder experts. However, no further details found. [Policies - Human Rights Statements, Nov 2018: corporate.walmart.com]
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to remedy Score 2 <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

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A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Zero tolerance attacks on HRs Defenders (HRDs): Evidence found only in relation to protecting the integrity of reporters in the context of ethics violations. [Global Statement of Ethics: walmartethics.com] Score 2 <ul style="list-style-type: none"> Not met: Expects AG suppliers to reflect company HRD commitments Not met: Expects AP suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: CEO or Board approves policy: Its Human Rights Statement was approved by the Board of Directors on November 2, 2018 and its Global Statement of Ethics is signed by the CEO. [Policies - Human Rights Statements, Nov 2018: corporate.walmart.com & Global Statement of Ethics: walmartethics.com] Not met: Board level responsibility for HRs: The Nominating and Governance Committee is responsible for the review of 'Social, community, sustainability and charitable giving initiatives'. In addition, in its Human Rights Statement, the Company indicates that the 'Board reviews our progress on human rights, at minimum, annually'. However, this information comes from different documentation and therefore it is not clear which board member or board committee is tasked with governance oversight of human rights. [Proxy Statement, 2018: s2.q4cdn.com & Policies - Human Rights Statements, Nov 2018: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> Met: Speeches/letters by Board members or CEO: The CEO made a speech in which it mentions how forced labour can take place and indicates that the Company joined the Leadership Group for Responsible Recruitment. The company also state that 'diversity and inclusion are very important in Walmart. We want everyone to be able to do well. We believe women should be paid the same as men for doing the same job, obviously'. [CEO Speech at Net Impact: corporate.walmart.com]
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Board/Committee review of salient HRs Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member: The Company indicates that 'associates subject to its culture, diversity and inclusion' goals program have 10% of their annual performance evaluation tied to diversity and inclusion and can have their annual cash incentive reduced by up to 30% if they violate our discrimination and harassment policies'. However, it is not clear whether board members are included, the incentive refers only to non-discrimination which is not considered a key industry risk, and part of the incentive seems reactive (reduction of bonus for violate policy) [Global Responsibility Report 2018, 2018: corporate.walmart.com] Not met: At least one key AG HR risk, beyond employee H&S Not met: At least one key AP HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to ILO core conventions: See indicator A.1.2

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			<ul style="list-style-type: none"> • 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.' <p>[Reflecting on What We've Built:Walmart's Global Ethics & Compliance Program, 2017: cdn.corporate.walmart.com & Policies - Human Rights Statements, Nov 2018: corporate.walmart.com]</p> <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
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights • Not met: At least one key AG HR risk, beyond employee H&S • Not met: At least one key AP HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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 ILO core conventions: See indicator A.1.2 [Policies - Human Rights Statements, Nov 2018: corporate.walmart.com] • Not met: Communicates its policy to all workers in own operations: The Company states in its Human Rights Statement that it seeks ' to be transparent about our human rights efforts and will periodically provide additional details, inclusive of our priorities, through our Global Responsibility Report or similar means. 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.' <p>However, there is no further information about how it communicate its human rights policy to all workers. [Global Statement of Ethics: walmartethics.com & Policies - Human Rights Statements, Nov 2018: corporate.walmart.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder: See above • Not met: How policy commitments are made accessible to audience: See above
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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 all 4 ILO core conventions for suppliers • Met: Requiring AG suppliers to communicate policy down the chain: The Standards for suppliers, which include specific sections related to: forced labour, underage labour, fair employment process, working hours, freedom of association and health and safety, is part of the contractual agreements with suppliers. In addition, the Company indicates: 'We expect you and all facilities in your supply chain to embrace both the words of and principles behind these Standards for Suppliers.' and also: ' Suppliers are responsible for compliance with these Standards throughout their operations and throughout the entire product supply chain.' <p>[Standard for Suppliers: cdn.corporate.walmart.com]</p> <ul style="list-style-type: none"> • Met: Requiring AP suppliers to communicate policy down the chain: The Standards for suppliers, which include specific sections related to: forced labour, underage labour, fair employment process, working hours, freedom of association and health and safety, is part of the contractual agreements with suppliers. In

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			<p>addition, the Company indicates: 'We expect you and all facilities in your supply chain to embrace both the words of and principles behind these Standards for Suppliers.' and also: 'Suppliers are responsible for compliance with these Standards throughout their operations and throughout the entire product supply chain.' [Standard for Suppliers: cdn.corporate.walmart.com] Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual: See above [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Including on AG suppliers: See above. It is not clear whether the contractual/binding arrangements cascade to its suppliers' supply chain. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Including on AP suppliers: See above [Standard for Suppliers: cdn.corporate.walmart.com]
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: In its Website section 'Responsible Sourcing', the Company describes how it provides 'training and tools for our associates and suppliers, and collaborate with others to make progress on key industry-wide issues.' However, there is no further information about training on HR policy for all workers or relevant managers. [Policies - Human Rights Statements, Nov 2018: corporate.walmart.com & Responsible Sourcing: corporate.walmart.com] • Not met: Trains relevant AG managers including procurement: See above • Not met: Trains relevant AP managers including procurement: See above <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Both requirements under score 1 met: See above
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Not met: Monitoring implementation of HR policy commitments: CHRB could not find information about how it monitors its HR policy implementation covering the Company globally. [Policies - Human Rights Statements, Nov 2018: corporate.walmart.com] • Met: Monitoring AG suppliers: The Company indicates in its Website section 'Audit and Monitoring' that: 'we use social, safety and environmental compliance audits to help us evaluate our suppliers' overall compliance.' [Audits and Monitoring (website): corporate.walmart.com] • Met: Monitoring AP suppliers: See above [Audits and Monitoring (website): corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Met: Describes corrective action process: On its Website the Company describes the investigation and corrective action process when a non-compliance appears: 'To reinforce the supplier's responsibility for managing its supply chain in a manner consistent with our Standards for Suppliers, we administer the Supplier Strike program. A supplier may receive a 'Strike' for certain findings of noncompliance in their supply chains. [...] The Strike program creates an escalating set of pressures and consequences for suppliers that can lead to termination of their business with Walmart. Strikes remain on a supplier's record for two years, and three strikes within a two-year period will typically result in a significant reduction or termination of a supplier's business relationship with Walmart. The Strike program is one of the tools we use to promote a compliant supply chain.' The company also makes reference to a colour rating based on the third-party program's evaluation: 'Walmart uses colour ratings as a tool to make decisions about suppliers and facilities and to promote remediation'. 'All suppliers using the facility are expected to work with the facility to remediate all non-compliances identified in the report in the manner dictated by the audit program chosen. In addition to this audit program-driven remediation, Walmart expects suppliers to prioritize the remediation of higher-risk findings that would lead to the facility receiving an Orange rating'. Orange rating identifies facilities with serious violations. Three consecutive orange makes a red rating which would lead to temporarily or permanently terminate facility's ability to produce product. [Audits and Monitoring (website): corporate.walmart.com] • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored: In its Global Responsibility Report 2018 the Company indicates that it has 'reviewed and assessed compliance

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>with our Standards for more than 13,000 audits'. However there is no information about the percentage that this number represents. [Global Responsibility Report 2018, 2018: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not met: Discloses % of AP supply chain monitored: See above [Global Responsibility Report 2018, 2018: corporate.walmart.com]
B.1.7	Engaging business relationships	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: HR affects AG selection of suppliers: In its 'Audits and Monitoring' website section the Company states: 'new facilities in Category 3 countries will be required to receive an audit with a Green or Yellow rating prior to producing product for sale at Walmart.' [Audits and Monitoring (website): corporate.walmart.com] • Met: HR affects on-going AG supplier relationships: In its 'Audits and Monitoring' website section the Company indicates: 'Non-compliances and failure to remediate constitute grounds for consequences for suppliers and facilities, up to and including termination of the supplier's business relationship with Walmart and/or a facility's ability to produce goods for sale at Walmart.' [Audits and Monitoring (website): corporate.walmart.com] • Met: HR affects AP selection of suppliers: See above [Audits and Monitoring (website): corporate.walmart.com] • Met: HR affects on-going AP supplier relationships: See above [Audits and Monitoring (website): corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above • Met: Working with AG suppliers to improve performance: In its 'Promoting Responsibility' website section the Company describes some initiatives where it assist its suppliers so they 'improve transparency, empower workers and drive compliance in several key areas' such as safety, working conditions, human trafficking, etc. On example is its work to address human trafficking in the Thai seafood industry: 'Since 2015 we have engaged with the Government of Thailand, both in Washington, D.C. and in Bangkok, Thailand to clarify our expectations which include strengthening legal frameworks, industry oversight and law enforcement, and encouraging the prosecution of those involved in human trafficking. In addition, Walmart has joined the Issara Institute as a strategic partner to strengthen worker voice in Thai shrimp supply chains. Provided orientation and training to suppliers of Thai shrimp to help them monitor and improve labour conditions in their supply chains.' [Promoting Responsibility: corporate.walmart.com] • Met: Working with AP suppliers to improve performance: See above [Promoting Responsibility: corporate.walmart.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: In its Global Responsibility Report 2018 the Company resume its approach to stakeholders engagement. However it does not include a description of it identification process. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Frequency and triggers for engagement: In its Global Responsibility Report 2018 the Company describes the actions taken in order to work and engage with its stakeholders. However there is no information related to triggers or frequency. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Workers in AG SC engaged: In its Global Responsibility Report 2018 the Company discloses a list of its identified Stakeholders. Suppliers workers are not included nor trade unions. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Communities in the AG SC engaged: In its Global Responsibility Report 2018 the Company discloses a list of its identified Stakeholders. Communities are included. However, there is no evidence of an identification process or system. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Workers in AP SC engaged: See above [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Communities in the AP SC engaged: See above [Global Responsibility Report 2018, 2018: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 the process to identify its human rights risks and impacts. [Policies - Human Rights Statements, Nov 2018: corporate.walmart.com] • Not met: Identifying risks in AG suppliers: On its website section 'Responsible Sourcing', the Company indicates: 'Through our Responsible Sourcing program, we set expectations of suppliers and the facilities they use, assess supply chain risk, monitor supply chain conditions through audits and investigations' [...] 'We are always looking for ways to refine our risk-based audit program. In addition to a facility's country, we may look at other variables, including industry-specific risks, supplier compliance management systems and other factors as we evaluate the risk of facilities over time.' However, this system does not include the identification of human right risks, but the identification of facilities with higher-risk non-compliances. [Responsible Sourcing: corporate.walmart.com] • Not met: Identifying risks in AP suppliers: See above [Responsible Sourcing: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification: See above [Policies - Human Rights Statements, Nov 2018: corporate.walmart.com] • Not met: In consultation with stakeholders: See above [Policies - Human Rights Statements, Nov 2018: corporate.walmart.com] • Not met: In consultation with HR experts: See above [Policies - Human Rights Statements, Nov 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)	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: 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, Nov 2018: corporate.walmart.com] • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met: See above
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 • Met: Example of Actions decided: On its website section ', 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.', 'Factories in Bangladesh are undergoing remediation in several areas, including upgrading of 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 [...],

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Environmental, Health and Safety (EHS) Academy in Bangladesh'. [Our Commitment to the Workers of Bangladesh: corporate.walmart.com] Score 2 • 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	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 • 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 Score 2 • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

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	The individual elements of the assessment are met or not as follows: Score 1 • 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] Score 2 • 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] • Met: Expect AG supplier to have equivalent grievance systems: See above [Standard for Suppliers: cdn.corporate.walmart.com] • Met: Opens own system to AG supplier workers: See above [Walmart Global ethics website: walmartethics.com & Facility Posters: corporate.walmart.com] • Met: Expect AP 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: cdn.corporate.walmart.com] • Met: Opens own system to AP supplier workers: The Company has an open grievance system: 'Global Ethics website' available for use worldwide by both associates and non-associates, in multiple languages. It also include 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.' [Walmart Global ethics website: walmartethics.com & Facility Posters: corporate.walmart.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or	1	The individual elements of the assessment are met or not as follows: Score 1 • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
	concerns from external individuals and communities		<p>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.' [Walmart Global ethics website: walmartethics.com & Policies - Human Rights Statements, Nov 2018: corporate.walmart.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: The Company has an open grievance system: 'Global Ethics website' available for use worldwide by both associates and non-associates, in multiple languages, including local languages for relevant locations (Chinese, Japanese, Bengali, Arabic, Hindi, Punjabi, Korean, etc.). However, the country has translated for some countries but not for all countries. [Walmart Global ethics website: walmartethics.com] • Not met: Expects AG supplier to have community grievance systems [2018 Annual Report, 2018: s2.q4cdn.com] • Not met: AG supplier communities use global system [Walmart Global ethics website: walmartethics.com] • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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 users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment • Not met: AP suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	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 statement prohibiting retaliation: In its Global Statement of Ethics the Company states: 'Walmart prohibits retaliation against any associate who raises a concern.' It also states as an additional responsibility for Management: '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.' [Global Statement of Ethics: walmartethics.com] • Met: Practical measures to prevent retaliation: About its Global Ethics Helpline the Company indicates: '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 addition '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' [Global Statement of Ethics: walmartethics.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AG suppliers to prohibit retaliation: Although the Standard for suppliers manual includes a non retaliation policy, it only applies to workers but not other stakeholders, and it is only mentioned in regard to Voluntary labour and free association and collective bargaining. [Standard for Suppliers Manual (no longer valid), 2014: cdn.corporate.walmart.com & Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Expects AP suppliers to prohibit retaliation: See above [Standard for Suppliers Manual (no longer valid), 2014: cdn.corporate.walmart.com & Standard for Suppliers: cdn.corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> Not met: Will work with state based or non judicial mechanisms Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	1.5	The individual elements of the assessment are met or not as follows: Score 1 <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, as a member of the Alliance for Bangladesh Worker Safety, the Company has fully supported both the remediation of factory buildings to make them more safe as well as contributing to the BRAC, a global based NGO in Bangladesh, to support those affected by Rana Plaza and other disasters: ' [Our Commitment to the Workers of Bangladesh: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> Met: Changes introduced to stop repetition: 'We recognize a need for heightened attention to fire-related risks in certain parts of the world, including Bangladesh. Our plans include re-emphasizing our standards, training suppliers and facilities and collaborating with other brands and retailers to drive industry-wide results. [...] We also conducted a separate evaluation of Bangladesh facilities focused on fire safety; factories that fell within several high-risk categories were asked to shift production to other facilities.' [Our Commitment to the Workers of Bangladesh: corporate.walmart.com] Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

D.1 Agricultural Products

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Living wage in supplier code or contracts Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Avoids business model pressure on HRs (purchasing practices) Not met: Positive incentives to respect human rights (purchasing practices): The approach used by the Company is to penalize non-compliances. Positive incentives were not found. [Responsible Sourcing: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Identifies suppliers back to manufacturing sites (factories or fields): As a Board Member of the Seafood Task Force, the Company has participated in leading the Seafood Task Force to 'create supply chain maps' and 'establish a system to track products across the supply chain'. However, this mapping is focused only on Seafood. The Company also has a disclosure policy and guidance showing how suppliers must disclose a facility to 'Responsible sourcing' department. However, these do not seem to include farms. [Global Responsibility Report 2018, 2018: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> Not met: Discloses significant parts of SP and why: The Company has a Disclosure policy that requires suppliers to disclose its facilities to the Company's Responsible sourcing. However, no evidence found of the Company publicly disclosing a map of its agricultural supply chain including locations. [Disclosure Policy and Guidance, April 2018: cdn.corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	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: Child Labour rules in codes or contracts: In its 'Standards for suppliers' the Company states: 'Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor—from your operations and supply chain.[...] Comply with all applicable laws, regulations, agreements and industry requirements relating to the employment of young workers.[...] Verify worker eligibility prior to employment.' ' However, no evidence found in relation to guidelines for remediation programmes. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: How working with suppliers on child labour: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers, such as training or remediation programs. [Facility Posters: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	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: Debt and fees rules in codes or contracts: In its 'Standards for suppliers' document the Company' states: 'Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor—from your operations and supply chain.[...] Take steps to recruit responsibly, including by not charging vulnerable workers recruitment or similar fees (or repaying any such fees charged), by providing migrant workers an understandable and accurate employment contract in their native language prior to departure from their home country, and by holding your agents and any labor brokers and recruiters you use to the same standards.' ' In addition, the Company released a Statement of Principles on Responsible Recruitment in Global Supply Chains where it addressed the risks of involuntary labor in its global supply chain promoting the use of responsible recruitment practices through its Employer Pays Principle. [Standard for Suppliers: cdn.corporate.walmart.com & Statement of Principles on Responsible Recruitment in Glocal Supply Chains, Jan 2019: https://corporate.walmart.com/media-library/document/responsible-recruitment-statement-of-principles/_proxyDocument?id=00000168-cf0d-d9f9-a7f8-df6d1b500001#Old-companies-list-of-Disclosure-Easy-format.docx#_Hlk29302691,26882,27037,0,,corporate.walmart.com] • Met: How working with suppliers on debt & fees: Walmart is a member of the Core Group of the Leadership Group for Responsible Recruitment: 'A major cause of forced labour in today's global supply chains is the charging of recruitment fees to migrant workers. Reflecting the Dhaka Principles for Migration with Dignity, the Employer Pays Principle is a commitment to ensure that no worker should pay for a job. It is endorsed by the Leadership Group for Responsible Recruitment, a collaboration between leading companies and expert organisations driving positive change in the way that migrant workers are recruited. This Responsible Recruitment Gateway provides access to a range of tools and information to help companies move towards ethical recruitment.' This year the Company participated in the Global Forum on Responsible Recruitment and Employment which brought 'together global brands, suppliers, recruitment agencies, governments, and NGOs to discuss and examine the challenges of recruiting migrant workers, and how implementing ethical recruitment is vital in protecting workers from modern slavery as well as ensuring sustainable and efficient business operations.' [Responsible Recruitment: ihrb.org & Global Forum on Responsible Recruitment and Employment, 2018: ihrb.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Not met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	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: Free movement rules in codes or contracts: In its 'Standards for suppliers' document, the Company indicates: '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: cdn.corporate.walmart.com] • Not met: How working with suppliers on free movement: The Company has co-lead the development of the Consumer Goods Forum Forced Labour Priority Principles, one of this principles is: 'Every worker should have freedom of movement. The ability of workers to move freely should not be inhibited by their employer.' [...] 'The CGF and its members will now work to uphold these practices in their own operations, and will use their collective voice to promote the adoption of these priority principles industry-wide. As part of a 2017 action plan, members will take individual actions to mainstream the Principles with an initial focus in two supply chains of particular relevance to the industry - seafood and palm oil in Southeast Asia.' However, in order to award this score, evidence of the actual work carried out by the Company is needed. On the other hand the Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers to improve performance on this particular topic. [Consumer goods industry sets bar in fight against forced labour: media.theconsumergoodsforum.com & Facility Posters: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	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: FoA & CB rules in codes or contracts: In its 'Standards for suppliers' document, the Company indicates: 'Respect the rights of workers to join, form or assist a trade union, or refrain from doing so, in accordance with applicable law and practice.' Although the heading for this section reads: 'Recognize freedom of association and collective bargaining', the actual commitment does not include collective bargaining. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: How working with suppliers on FoA and CB: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers. [Facility Posters: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	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"> • Met: Sets out clear Health and Safety requirements: In its Standards for Suppliers, the Company indicates: 'Cultivate a safe, clean and healthy work environment as appropriate for your industry, geography and workforce. Provide access to clean and sanitary facilities, water, and—as appropriate—dormitories and food. Implement procedures and safeguards to prevent accidents and injuries to workers, including proper maintenance, established monitoring and inspection routines, worker training and protection, fire safety measures and restrictions on hazardous work for young workers.' [Standard for Suppliers Manual (no longer valid), 2014: cdn.corporate.walmart.com] • Not met: Injury Rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosure <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: In its Global Responsibility Report 2018 the Company describes how it engages with suppliers to improve their practices in relation with health and safety, specifically in subjects related with fire safety, as the Company it is a salient issue faced in the apparel sector. The Company was a founding member of the Alliance for Bangladesh Worker Safety, a program focus on fire safety training among other actions. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Rules on land & owners in codes or contracts: In its Standards for Suppliers, the Company indicates: 'Maintain and comply with licenses and permits as required and appropriate for your industry, geography and facility.' However, there is no mention to requirements to have a process to identify legitimate tenure rights holders when acquiring, leasing or making other arrangements to use, with particular attention to vulnerable tenure rights holders. [Standard for Suppliers: cdn.corporate.walmart.com] Not met: How working with suppliers on land issues Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Rules on water stewardship in codes or contracts Not met: How working with suppliers on water stewardship issues Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Women's rights in codes or contracts: In its Standards for Suppliers, 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: cdn.corporate.walmart.com] Met: How working with suppliers on women's rights: The Company is implementing an initiative to buy from women-owned suppliers: Women's Economic Empowerment (WEE) Initiative. This initiative included training and supported diversity inclusion in the supply chain. In addition, the Company is quoted as the most accomplished in Women issues in Oxfam Report 'Ripe for Change': 'Walmart scored 29% for commitments it has made to sourcing from women owned companies, and to provide direct support to women in their supply chains.' [Global Responsibility Report 2018, 2018: corporate.walmart.com & Ripe for change, 2018: d1tn3vj7xz9fdh.cloudfront.net] Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress

D.2 Apparel

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Living wage in supplier code or contracts Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends demonstrating progress
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Avoids business model pressure on HRs Not met: Positive incentives to respect human rights: The approach used by the Company is to penalize non-compliances. Positive incentives were not found. [Responsible Sourcing: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
D.2.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Identifies suppliers back to product source: As a Board Member of the Seafood Task Force, the Company has participated in leading the Seafood Task Force to 'create supply chain maps' and 'establish a system to track products across the supply chain'. However, this mapping is focused only on Seafood. [Global Responsibility Report 2018, 2018: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why: The Company has a Disclosure policy that requires suppliers to disclose its facilities to the Company's Responsible sourcing. However, no evidence found of the Company publicly disclosing a map of its apparel supply chain including locations. [Disclosure Policy and Guidance, April 2018: cdn.corporate.walmart.com]
D.2.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	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: Child Labour rules in codes or contracts: In its 'Standards for suppliers' the Company states: 'Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor—from your operations and supply chain.[...] Comply with all applicable laws, regulations, agreements and industry requirements relating to the employment of young workers.[...] Verify worker eligibility prior to employment.' ' However, there is no guidelines related to remediation programmes. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: How working with suppliers on child labour: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers, such as training or remediation programs. [Facility Posters: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.2.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	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: Debt and fees rules in codes or contracts: In its 'Standards for suppliers' document the Company' states: 'Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor—from your operations and supply chain.[...] Take steps to recruit responsibly, including by not charging vulnerable workers recruitment or similar fees (or repaying any such fees charged), by providing migrant workers an understandable and accurate employment contract in their native language prior to departure from their home country, and by holding your agents and any labor brokers and recruiters you use to the same standards.' ' [Standard for Suppliers: cdn.corporate.walmart.com] • Met: How working with suppliers on debt & fees: Walmart is a member of the Core Group of the Leadership Group for Responsible Recruitment: 'A major cause of forced labour in today's global supply chains is the charging of recruitment fees to migrant workers. Reflecting the Dhaka Principles for Migration with Dignity, the Employer Pays Principle is a commitment to ensure that no worker should pay for a job. It is endorsed by the Leadership Group for Responsible Recruitment, a collaboration between leading companies and expert organisations driving positive change in the way that migrant workers are recruited. This Responsible Recruitment Gateway provides access to a range of tools and information to help companies move towards ethical recruitment.' This year the Company participated in the Global Forum on Responsible Recruitment and Employment which brought 'together global brands, suppliers, recruitment agencies, governments, and NGOs to discuss and examine the challenges of recruiting migrant workers, and how implementing ethical recruitment is vital in protecting workers from modern slavery as well as ensuring sustainable and efficient business operations.' [Responsible Recruitment: ihrb.org & Global Forum on Responsible Recruitment and Employment, 2018: ihrb.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	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: Free movement rules in codes or contracts: In its 'Standards for suppliers' document, the Company indicates: '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: cdn.corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company has co-lead the development of the Consumer Goods Forum Forced Labour Priority Principles, one of this principles is: 'Every worker should have freedom of movement. The ability of workers to move freely should not be inhibited by their employer.' [...] 'The CGF and its members will now work to uphold these practices in their own operations, and will use their collective voice to promote the adoption of these priority principles industry-wide. As part of a 2017 action plan, members will take individual actions to mainstream the Principles with an initial focus in two supply chains of particular relevance to the industry - seafood and palm oil in Southeast Asia.' However, in order to award this score, evidence of the actual work carried out by the Company is needed. The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers to improve performance on this particular topic. [Consumer goods industry sets bar in fight against forced labour: media.theconsumergoodsforum.com & Facility Posters: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	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: FoA & CB rules in codes or contracts: In its 'Standards for suppliers' document, the Company indicates: 'Respect the rights of workers to join, form or assist a trade union, or refrain from doing so, in accordance with applicable law and practice.' Although the heading for this section reads: 'Recognize freedom of association and collective bargaining', the actual commitment does not include collective bargaining. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: How working with suppliers on FoA and CB: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers. [Facility Posters: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	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"> • Met: Sets out clear Health and Safety requirements: In its Standards for Suppliers, the Company indicates: 'Cultivate a safe, clean and healthy work environment as appropriate for your industry, geography and workforce. Provide access to clean and sanitary facilities, water, and—as appropriate—dormitories and food. Implement procedures and safeguards to prevent accidents and injuries to workers, including proper maintenance, established monitoring and inspection routines, worker training and protection, fire safety measures and restrictions on hazardous work for young workers.' [Standard for Suppliers Manual (no longer valid), 2014: cdn.corporate.walmart.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: In its Global Responsibility Report 2018 the Company describes how it engages with suppliers to improve their practices in relation with health and safety, specifically in subjects related with fire safety, as the Company it is a salient issue faced in the apparel sector. The Company was a founding member of the Alliance for Bangladesh Worker Safety, a program focus on fire safety training among other actions. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.8.b	Women's rights (in the supply chain)	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: Women's rights in codes or contracts: In its Standards for Suppliers, 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: cdn.corporate.walmart.com] • Met: How working with suppliers on women's rights: The Company is implementing an initiative to buy from women-owned suppliers: Women's Economic Empowerment (WEE) Initiative. This initiative included training and supported diversity inclusion in the supply chain. In addition, the Company is quoted as the most accomplished in Women issues in Oxfam Report 'Ripe for Change': 'Walmart scored 29% for commitments it has made to sourcing from women owned companies, and to provide direct support to women in their supply chains.' [Global Responsibility Report 2018, 2018: corporate.walmart.com & Ripe for change, 2018: d1tn3vj7xz9fdh.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.2.9.b	Working hours (in the supply chain)	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: Working hours in codes or contracts: The Company's Standards for suppliers includes working hours guidelines: 'Comply with all applicable laws and agreements regarding compensation and working hours. Provide compensation, benefits, working hours, breaks, rest days, holidays and leave that comply with legal requirements and applicable agreements. Help workers understand these terms.' However there is no direct reference to international laws, so it is not clear whether international conventions related with working hours are included in this guidelines. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: How working with suppliers on working hours: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However the posters do not clarify what the law say in reference to working hours, and there is no further information about the actual work the Company is doing with its suppliers. [Facility Posters: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

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: On 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. The case has been assigned to U.S. District Judge Barbara B. Crabb. The EEOC is seeking full relief, including back pay, compensatory and punitive damages, and non-monetary measures to correct Wal-Mart's practices going forward.</p> <ul style="list-style-type: none"> • Sources: [Company website -: abetterbalance.org][Reuters - 21/09/2018: reuters.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: 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. <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: 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. <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.
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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". However, there is no evidence of engaging with stakeholders.</p> <ul style="list-style-type: none"> • 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 werer 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 oftheir 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, June 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, June 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 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, Nov 2018: corporate.walmart.com & Global Statement of Ethics: walmartethics.com] • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			health and safety concern that are particularly prevalent among women workers. [Standard for Suppliers: cdn.corporate.walmart.com]
E(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <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. Score 2 <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: Walmart Supply chain alleged to be involved in slavery, human trafficking and forced labour in Thailand • Area: Forced labour • Story: In 2015 an investigative report by the Associated Press alleged slavery, human trafficking and forced labour at shrimp peeling facilities in Thailand that supply major supermarkets including Wal-Mart, Kroger, Whole Foods, Olive Garden a subsidiary of Darden Restaurants, and the retailer Dollar General. <p>The investigation focused on the Gig Peeling Factory in Samut Sakhon, which supplies the second largest Thai sea food supplier Thai Union as well as others, but makes clear there are other peeling sheds that also illicitly supply major exporters.</p> <p>Employees at the Gig Peeling Factory were alleged to be migrant workers and children and were reportedly subject to human rights abuses including being beaten, detained, trapped, forbidden to talk with colleagues and forced to work 16-hours a day sometimes without pay. Most workers were migrants from Burma without visas or work permits, it was reported. They were sold by a broker with promises of well-paid jobs, but expected to pay their debt to the employer (the purchaser) or the boat owner. When complaining, employees are alleged to be threatened because of their illegal status. Documented migrants were also vulnerable because their employer held on to identification papers so they could not leave. A follow-up report in 2016 found that many of the workers who had escaped from the Gig Peeling Factory were now living in shelters, having not received any remedy due to a 'slow moving court case' involving the company.</p> <ul style="list-style-type: none"> • Sources: [Globe and Mail - 14/12/2015: theglobeandmail.com][The Sydney Morning Herald - 02/07/2016: smh.com.au][The Guardian - 14/12/2015: theguardian.com][AP News - 14/12/2015: apnews.com]
E(3).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response available: The Company has responded through the press stating that they were looking into the issue and adding: 'we are aware of the Associated Press story, and we were horrified by the conditions and treatment of workers the reporters uncovered.' Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail
E(3).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved Score 2 <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: 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.
E(3).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <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 • 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	The individual elements of the assessment are met or not as follows: Score 1 <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'. Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail
E(4).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • 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 Score 2 <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question
E(4).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <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 Score 2 <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: 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(5).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <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. Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail: The company has not provided a detailed response to the allegation.
E(5).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 <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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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]</p> <ul style="list-style-type: none"> • 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: 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: cdn.corporate.walmart.com & Walmart Policies and Guidelines: corporate.walmart.com]
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 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.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.58 out of 4	Out of a total of 53 indicators assessed under sections A-D of the benchmark, Walmart Inc made data public that met one or more elements of the methodology in 21 cases, leading to a disclosure score of 1.58 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: According to its Global Sustainability Report 2017, the Company reports to the GRI. In its website it discloses a GRI Index. [Commitments & GRI, 2017: corporate.walmart.com & Global Reporting Index, Jul 2019: corporate.walmart.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	<p>Walmart Inc met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

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

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